

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re: ) Case No. 20-12345 (MG)  
THE ROMAN CATHOLIC DIOCESE OF ) Chapter 11  
ROCKVILLE CENTRE, NEW YORK, )  
Debtor.<sup>1</sup> )  
\_\_\_\_\_  
)

**NINTH INTERIM APPLICATION FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES BY  
BURNS BAIR LLP AS SPECIAL INSURANCE COUNSEL  
FOR THE PERIOD FROM JUNE 1, 2023 THROUGH SEPTEMBER 30, 2023**

In accordance with the Local Rules for the Southern District of New York, Burns Bair LLP (“Burns Bair” or the “Firm”), special insurance counsel for the Official Committee of Unsecured Creditors (the “Committee”) of The Roman Catholic Diocese of Rockville Centre, New York (the “Debtor”), submits this summary (this “Summary”) of fees and expenses sought as actual, reasonable, and necessary in the fee application to which this Summary is attached (the “Fee Application”)<sup>2</sup> for the period from June 1, 2023 through September 30, 2023<sup>3</sup> (the “Interim Compensation Period”).

Burns Bair submits the Fee Application as an interim fee application in accordance with the *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* dated November 4, 2020 [Docket No. 129] (the “Interim Compensation Order”).

---

<sup>1</sup> The Debtor in this chapter 11 case is The Roman Catholic Diocese of Rockville Centre, New York, the last four digits of its federal tax identification number are 7437, and its mailing address is 50 North Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571-9023.

<sup>2</sup> Capitalized terms used but not otherwise defined in this Summary shall have the meanings ascribed to such terms in the Application.

<sup>3</sup> The applicant reserves the right to include any time expended and expenses incurred in the period indicated above in future application(s) if it is not included herein.

Name of Applicant:	Burns Bair LLP
Name of client:	Official Committee of Unsecured Creditors
Time period covered by this application:	June 1, 2023 through September 30, 2023
Total compensation sought this period:	\$516,604.80
Total expenses sought this period:	\$17,357.31 <sup>4</sup>
Petition Date:	October 1, 2020
Retention Date:	Effective October 29, 2020
Date of order approving employment:	December 9, 2020
Total compensation approved by interim orders to date:	\$1,975,472.75
Total expenses approved by interim orders to date:	\$44,173.40
Blended rate in this application for all attorneys:	\$608.88
Blended rate in this application for all timekeepers:	\$605.85
Compensation sought in this application already paid pursuant to a monthly compensation order but not yet allowed:	\$267,223.24
Expenses sought in this application already paid pursuant to a monthly compensation order but not yet allowed:	\$2,404.67
Number of professionals included in this application	9
If applicable, number of professionals in this application not included in staffing plan approved by client:	N/A
If applicable, difference between fees budgeted and compensation sought for this period:	N/A
Number of professionals billing fewer than 15 hours to the case during this period:	3
Are any rates higher than those approved or disclosed at retention? If yes, calculate and disclose the total compensation sought in this application using the rates originally disclosed in the retention application:	No.

This is a:  Monthly  Interim  Final Application.

---

<sup>4</sup> This expense amount reflects a reduction of \$1,808.80 for two flights that were incorrectly included on Burns Bair's invoice for September time. The flight expenses were for the September 12, 2023 hearing on the Arrowood 2004 motion that was cancelled and later rescheduled for September 26, and thus the September 12 flight expenses should not have been included on the monthly invoice.

**Monthly Fee Statements (Ninth Interim Fee Period)**

June 1, 2023 through September 30, 2023

Date Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fees	Approved Expenses
7/31/2023 [Dkt. 2361]	June 1, 2023 – June 30, 2023	\$90,200.90	\$0	\$72,160.72	\$0
8/31/2023 [Dkt. 2454]	July 1, 2023 – July 31, 2023	\$125,017.55	\$2,404.67	\$100,014.04	\$2,404.67
9/29/2023 [Dkt. 2525]	August 1, 2023 – August 31, 2023	\$118,810.60	\$0	\$95,048.48	\$0
10/31/2023 [Dkt. 2622]	September 1, 2023 – September 30, 2023	\$182,575.75	\$14,952.64 <sup>5</sup>	Pending	Pending

**Prior Interim Fee Applications**

Date Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fees	Approved Expenses
March 17, 2021 [Dkt. 411]	October 1, 2020 – January 31, 2021	\$175,221.50	\$265.49	\$173,471.50	\$265.49
July 19, 2021 [Dkt. 618]	February 1, 2021 – May 31, 2021	\$131,852.00	\$1,366.80	\$130,462.00	\$1,366.80
November 15, 2021 [Dkt. 849]	June 1, 2021 – September 30, 2021	\$80,481.00	\$3,696.84	\$80,481.00	\$3,696.84
March 15, 2022 [Dkt. 1011]	October 1, 2021 – January 21, 2022	\$75,804.00	\$1,078.25	\$75,804.00	\$1,078.25
July 14, 2022 [Dkt. 1198]	February 1, 2022 – May 31, 2022	\$256,054.50	\$11,902.49	\$256,054.50	\$11,902.49
November 14, 2022 [Dkt. 1444]	June 1, 2022 – September 30, 2022	\$497,990.75	\$6,395.75	\$497,990.75	\$6,395.75
March 14, 2023 [Dkt. 1809]	October 1, 2022 – January 31, 2023	\$411,679.25	\$11,848.82	\$411,679.25	\$11,848.82
July 17, 2023 [Dkt. 2321]	February 1, 2023 – May 31, 2023	\$346,389.75	\$7,618.93	\$346,389.75	\$7,618.93

---

<sup>5</sup> As noted earlier, the firm is only seeking reimbursement of \$14,952.64 in expenses, reflecting a reduction of \$1,808.80 for two flights that were incorrectly included on its invoice for September time for a hearing that was cancelled and rescheduled for later in the month.

**Summary of Compensation Requested by Project Category**

<b>Insurance Recovery Activities</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
	Timothy Burns	215.70	\$975.00	\$210,307.50
	Jesse Bair	204.50	\$625.00	\$127,812.50
	Nathan Kuenzi	78.10	\$420.00	\$32,802.00
	Brian Cawley	206.00	\$420.00	\$86,520.00
	Leakhena Au	32.50	\$420.00	\$13,650.00
	Katie Sticklen	36.10	\$378.00	\$13,645.80
	Karen Dempski	1.90	\$360.00	\$684.00
	Alyssa Turgeon	2.40	\$360.00	\$864.00
	<b>Total:</b>	<b>777.20</b>		<b>\$486,285.80</b>
<hr/>				
<b>Fee Statements / Fee Applications</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
	Jesse Bair	2.90	\$625.00	\$1,812.50
	Nathan Kuenzi	3.90	\$420.00	\$1,638.00
	Brenda Horn-Edwards	5.30	\$360.00	\$1,908.00
	Karen Dempski	.80	\$360.00	\$288.00
	<b>Total:</b>	<b>12.90</b>		<b>\$5,646.50</b>
<hr/>				
<b>Non-Working Travel</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
	Timothy Burns	29.20	\$487.50	\$14,235.00
	Jesse Bair	33.40	\$312.50	\$10,437.50
	<b>Total:</b>	<b>62.60</b>		<b>\$24,672.50</b>

Dated: November 15, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ James I. Stang

James I. Stang, Esq.  
Iain A. W. Nasatir, Esq.  
Karen Dine, Esq.  
Brittany M. Michael, Esq.  
780 Third Avenue, 36th Floor  
New York, NY 10017-2024  
Telephone: 212/561-7700  
Facsimile: 212/561-7777  
[jstang@pszjlaw.com](mailto:jstang@pszjlaw.com)  
[inasatir@pszjlaw.com](mailto:inasatir@pszjlaw.com)  
[kdine@pszjlaw.com](mailto:kdine@pszjlaw.com)  
[bmichael@pszjlaw.com](mailto:bmichael@pszjlaw.com)

*Counsel for the Official Committee of Unsecured Creditors*

BURNS BAIR LLP

/s/ Timothy W. Burns

Timothy W. Burns, Esq. (admitted *pro hac vice*)  
Jesse J. Bair, Esq. (admitted *pro hac vice*)  
10 E. Doty St., Suite 600  
Madison, WI 53703-3392  
Telephone: (608) 286-2808  
Email: [tburns@burnsbair.com](mailto:tburns@burnsbair.com)  
Email: [jbair@burnsbair.com](mailto:jbair@burnsbair.com)

*Special Insurance Counsel to the Official Committee of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re: ) Case No. 20-12345 (MG)  
THE ROMAN CATHOLIC DIOCESE OF ) Chapter 11  
ROCKVILLE CENTRE, NEW YORK, )  
Debtor.<sup>6</sup> )

---

**NINTH INTERIM APPLICATION FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES BY  
BURNS BAIR LLP AS SPECIAL INSURANCE COUNSEL  
FOR THE PERIOD FROM JUNE 1, 2023 THROUGH SEPTEMBER 30, 2023**

Burns Bair LLP (“Burns Bair” or the “Firm”), special insurance counsel to the Official Committee of Unsecured Creditors (the “Committee”) of the Debtor in the above-captioned case (the “Debtor”), hereby submits this ninth interim fee application (the “Fee Application”) for the period from June 1, 2023 through September 30, 2023 (the “Interim Compensation Period”) in accordance with the *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* dated November 4, 2020 [Docket No. 129] (the “Interim Compensation Order”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Bankruptcy Rules for the Southern District of New York (the “Local Rules”), the Amended Guidelines for Fees and Disbursements for Professionals in the Southern District of New York Bankruptcy Cases, effective December 4, 2009 (together with the “Local Rules”, the “Local Guidelines”), the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. §330, effective January 31, 1996 (the “U.S. Trustee Guidelines”), and this Court’s Order Authorizing and Approving The Official Committee of Unsecured Creditors’ Application to Retain and

---

<sup>6</sup> The Debtor in this chapter 11 case is The Roman Catholic Diocese of Rockville Centre, New York, the last four digits of its federal tax identification number are 7437, and its mailing address is 50 North Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571-9023.

Employ Burns Bair LLP as Special Insurance Counsel Effective as of October 29, 2020 [Docket No. 246]. Burns Bair requests compensation in the amount of \$516,604.80 for fees on account of reasonable and necessary professional services rendered to the Committee by Burns Bair during the Interim Compensation Period and reimbursement of actual and necessary costs and expenses in the amount of \$17,357.31<sup>7</sup> incurred by Burns Bair during the Interim Compensation Period. In support of this Fee Application, Burns Bair submits the declaration of Timothy W. Burns (the “Burns Declaration”) attached hereto as **Exhibit A** and incorporated herein by reference. In further support of the Application, Burns Bair respectfully represents as follows:

**Preliminary Statement**

1. During the Interim Compensation Period, Burns Bair represented, advised, and assisted the Committee in fulfilling its statutory obligations and duties to unsecured creditors and rendered services to the Committee in accordance with its instructions and directions. By this Fee Application, Burns Bair requests that the Court authorize the interim allowance and payment of fees and expenses incurred by Burns Bair during the Interim Compensation Period in the total amount of \$533,962.11 as compensation for services rendered to the Committee.

2. To date, Burns Bair has been paid a total of \$269,627.91, comprising (a) compensation of \$267,223.24, representing 80% of its fees incurred during the Interim Compensation Period; and (b) reimbursement of \$2,404.67, representing 100% of its actual and necessary expenses incurred during the Interim Compensation Period.<sup>8</sup> By this Fee Application,

---

<sup>7</sup> This expense amount reflects a reduction of \$1,808.80 for two flights that were incorrectly included on Burns Bair’s invoice for September time. The flight expenses were for the September 12, 2023 hearing on the Arrowood 2004 motion that was cancelled and later rescheduled for September 26, and thus the September 12 flight expenses should not have been included on the monthly invoice.

<sup>8</sup> These figures do not incorporate the amounts incurred for September time, which were included in Burns Bair’s monthly fee submissions filed on October 31, 2023 [Dkt. 2622]. As of the date of filing of this 9<sup>th</sup> Interim Application, Burns Bair has not yet received payment for those amounts.

Burns Bair seeks interim allowance and payment of all compensation for services rendered during the Interim Compensation Period.

**Jurisdiction and Basis for Relief**

3. This Court has jurisdiction to hear and determine this Fee Application pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409. Sections 328(a), 330, and 1103(a) of the Bankruptcy Code and Bankruptcy Rule 2014 are the statutory predicates for the relief sought by this Fee Application.

**Background**

4. On October 1, 2020 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with the Bankruptcy Court for the Southern District of New York. The Debtor is operating its business and managing its properties as debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in this case.

5. On October 16, 2020, the Office of the United States Trustee (the “UST”) appointed the Committee pursuant to Section 1102 of the Bankruptcy Code. The Committee consists of nine individuals who hold claims against the Debtor, including eight individuals who were sexually abused as minors by perpetrators for whom the Debtor was responsible and one representative of a minor with a civil rights claim against the Debtor.

**A. Burns Bair Retention**

6. Following the Committee’s appointment, the Committee determined it needed special insurance counsel and, subject to Court approval, hired Burns Bair on October 29, 2020.

7. On November 20, 2020, the Committee filed The Official Committee of Unsecured Creditors' Application to Retain and Employ Burns Bair LLP as Special Insurance Counsel Effective as of October 29, 2020 (the "Retention Application"). As set forth in the Retention Application, the Committee selected Burns Bair to provide the following services to the Committee:

- i. Analyzing, investigating, and assessing the availability of coverage under the Diocese's insurance policies;
- ii. Representing the Committee in the adversary proceeding the Diocese filed against its insurers, Adv. Pro. No. 20-01227, *The Roman Catholic Diocese of Rockville Centre, New York v. Arrowood Indemnity Co. fka Royal Insurance Co., et al.*;
- iii. Engaging in potential mediation and/or other resolution of the claims, demands, and/or lawsuits related to the Diocese's insurance policies;
- iv. Advising, negotiating, and advocating on behalf of the Committee with respect to the Diocese's insurance policies; and;
- v. Providing related advice and assistance to the Committee as necessary.

8. On December 9, 2020, the Court entered the Order Authorizing and Approving The Official Committee of Unsecured Creditors' Application to Retain and Employ Burns Bair LLP as Special Insurance Counsel Effective as of October 29, 2020 [Docket 246] (the "Retention Order"). The Retention Order provides that all compensation and reimbursement of costs and expenses incurred during Burns Bair's employment be paid only after appropriate application and approval of this Court.

## **B. Compensation Paid and Its Source**

9. All services for which Burns Bair requests compensation were performed for or on behalf of the Committee. Burns Bair has received no payment and no promises for payment from any source other than the Debtor for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or

understanding between Burns Bair and any other person other than the partners of Burns Bair for the sharing of compensation to be received for services rendered in these cases. Burns Bair has not received a retainer in these cases.

**C. Monthly Fee Statements for the Interim Compensation Period**

10. Burns Bair has filed and served the following monthly fee statements for the period June 1, 2023 through September 30, 2023, pursuant to the Interim Compensation Order. To date, no objections to the Prior Monthly Statements have been filed.

Date Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fees	Approved Expenses
7/31/2023 [Dkt. 2361]	June 1, 2023 – June 30, 2023	\$90,200.90	\$0	\$72,160.72	\$0
8/31/2023 [Dkt. 2454]	July 1, 2023 – July 31, 2023	\$125,017.55	\$2,404.67	\$100,014.04	\$2,404.67
9/29/2023 [Dkt. 2525]	August 1, 2023 – August 31, 2023	\$118,810.60	\$0	\$95,048.48	\$0
10/31/2023 [Dkt. 2622]	September 1, 2023 – September 30, 2023	\$182,575.75	\$14,952.64 <sup>9</sup>	Pending	Pending

11. The fees requested are reasonable, and all amounts requested were for actual and necessary services rendered on behalf of the Committee.

**Statement of Services Rendered and Time Expended**

12. **Exhibit B** sets forth a timekeeper summary that includes the respective names, positions, bar admissions, hourly billing rates and aggregate hours spent by each Burns Bair professional and paraprofessional that provided services to the Committee during the Interim Compensation Period. The rates charged by Burns Bair for services rendered to the Committee

---

<sup>9</sup> As noted earlier, the firm is only seeking reimbursement of \$14,952.64 in expenses, reflecting a reduction of \$1,808.80 for two flights that were incorrectly included on its invoice for September time for a hearing that was cancelled and rescheduled for later in the month.

are the same rates that Burns Bair charges generally for professional services rendered to its non-bankruptcy clients.

13. **Exhibit C** sets forth a disbursement summary that includes the aggregate expenses, organized by general disbursement categories, incurred by Burns Bair in connection with services rendered to the Committee during the Interim Compensation Period.

14. **Exhibit D** sets forth a summary of compensation requested by project category.

15. **Exhibit E** is a chart setting forth the Customary and Comparable Compensation Disclosures.

16. Burns Bair's invoices for the Interim Compensation Period were attached as exhibits to the Prior Monthly Statements [Docket Nos. 2361, 2454, 2525, and 2622].

#### **Services Rendered and Disbursements Incurred During the Interim Compensation Period**

17. During the Interim Compensation Period, Burns Bair expended a considerable number of hours on behalf of the Committee including, but not limited to, preparing for and participating in multiple, in-person and telephonic mediation sessions; participating in various meet and confer sessions with the Debtor regarding case insurance issues, including associated correspondence regarding same; drafting Rule 2004 discovery requests to Arrowood, including associated legal research, briefing, oral argument, as well as subsequent meet and confers regarding the scope of production and review of Arrowood's materials; drafting derivative action complaint against LMI and Interstate regarding their unfair business practices under New York General Business Law Section 349, including associated legal research, briefing, and oral argument; analysis and drafting of insurance demand letters; drafting motion to lift stay in connection with sending insurance demand letters, including associated legal research, briefing, and oral argument; detailed review of recently produced Diocesan coverage correspondence to

assess potential impact of the carriers' positions on case insurance strategy; attending motion to dismiss hearing for insurance purposes; analyzing insurance issues in connection with and strategy in light of motion to dismiss hearing outcome; drafting proposed motions for partial summary judgment against LMI and Interstate regarding the consent to settle issue; analysis regarding recent Diocese of Camden decision and assessing potential impact, if any, on insurance issues in the DRVC case; continued analysis of the Diocese's historical insurance program; presenting to the Committee on insurance strategy; continued analysis and consideration of the insurance impacts, if any, of the Debtor's claims objections and state court counsel's responses to same; analysis of insurance issues in connection with the Debtor's proposed settlement term sheet; continued research in connection with insurance issues impacting the Committee Plan; continued detailed research and analysis of issues concerning Arrowood, including its financial condition, claims handling practices, and potential regulatory and litigation options the Committee may have to remedy same, as well as research in connection with the New York Insurance Guarantee Fund; and formulating overall insurance strategy on behalf of the Committee. These tasks are not meant to be a detailed description of all work performed.

18. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by Burns Bair is fair and reasonable given (a) the complexity of the cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under the Bankruptcy Code. Moreover, Burns Bair has reviewed the requirements of the Local Rules, the Local Guidelines, and the Interim Compensation Order, and believes that this Application complies with such rule and order.

**Actual and Necessary Expenses Incurred by Burns Bair**

19. As summarized in **Exhibit C** attached hereto, Burns Bair has incurred a total of \$17,357.31 in expenses on behalf of the Committee during the Interim Compensation Period for which it seeks reimbursement.

**Allowance of Compensation**

20. Section 330(a)(1)(A) of the Bankruptcy Code provides that the Court may award to a professional person, “reasonable compensation for actual, necessary services rendered.” 11 U.S.C. § 330(a)(1)(A). Section 330(a)(3)(A), in turn, provides that in determining the amount of reasonable compensation to be awarded, the Court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including:

- i. The time spent on such services;
- ii. The rates charges for such services;
- iii. Whether the services were necessary to the administration of, or beneficial at the time which the service was rendered toward the completion of, a case under this title;
- iv. Whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; and
- v. Whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3)(A).

21. The congressional policy expressed above provides for adequate compensation in order to continue to attract qualified and competent professionals to bankruptcy cases. Burns Bair respectfully submits that the consideration of these factors should result in this Court’s allowance of the full compensation sought.

**Time and Labor Required**

22. During the Interim Compensation Period, the Committee relied heavily on the experience and expertise of Burns Bair when dealing with the matters described herein. As a result, Burns Bair devoted significant time and effort to perform properly and expeditiously the required professional services. During the Interim Compensation Period, Burns Bair expended 852.70 hours in providing the requested professional services. Burns Bair's hourly billing rate is based on Burns Bair's normal billing rates for services of this kind and is competitive with other advisory firms.

**Necessity of Burns Bair's Services**

23. This bankruptcy case addresses issues that raise complex questions and require a high level of skill and expertise to efficiently and accurately address. The professional services described herein were performed by Burns Bair to, among other things, ensure that the Roman Catholic Diocese of Rockville Centre, New York's over 60 years of insurance policies, including both primary and excess coverage, are fully available to compensate the sexual abuse survivors.

**Experience and Ability of the Professionals**

24. Burns Bair has extensive experience in complex insurance disputes and contested issues, including coverage litigation, insurance class actions, counterparty disputes with insurers, and domestic and international insurance arbitration. Additionally, Burns Bair has extensive experience advising and working in concert with other attorneys to navigate discrete insurance issues in the context of complex litigation proceedings. Burns Bair has successfully recovered substantial insurance proceeds in other actions involving insurance disputes arising from sexual abuse allegations involving Catholic dioceses.

**Reservation of Rights**

25. It is possible that some professional time expended or expenses incurred by Burns Bair during the Application Period are not reflected in this Application. Burns Bair reserves the right to include such amounts in future fee applications.

**Notice**

26. Pursuant to the Interim Compensation Order, Burns Bair has provided notice of this Fee Application upon the following parties by electronic or first class mail: (a) the Debtor c/o The Roman Catholic Diocese of Rockville Centre, 50 N Park Ave P.O. Box 9023, Rockville Centre, NY 11571-9023 (Attn: Thomas Renker); (b) the attorneys for the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); and (c) the Office of the United States Trustee Region 2 (the “U.S. Trustee”), 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.). No other or further notice need be provided.

**Conclusion**

27. Burns Bair respectfully requests that the Court enter an order, in the form attached hereto, (a) granting the relief requested in this Fee Application; (b) allowing (i) Burns Bair interim fees in the total amount of \$516,604.80 for services rendered in the Chapter 11 cases, and (ii) reimbursement of actual and necessary costs and expenses in the amount of \$17,357.31 during the Interim Compensation Period; (c) award and order to be paid to Burns Bair the balance of any such fees that remain unpaid, after deducting interim payments already received by Burns Bair pursuant to the Interim Compensation Order; and (d) granting such further relief as is just and proper.

Dated: November 15, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ James I. Stang

James I. Stang, Esq.  
Iain A. W. Nasatir, Esq.  
Karen Dine, Esq.  
Brittany M. Michael, Esq.  
780 Third Avenue, 36th Floor  
New York, NY 10017-2024  
Telephone: 212/561-7700  
Facsimile: 212/561-7777  
[jstang@pszjlaw.com](mailto:jstang@pszjlaw.com)  
[inasatir@pszjlaw.com](mailto:inasatir@pszjlaw.com)  
[kdine@pszjlaw.com](mailto:kdine@pszjlaw.com)  
[bmichael@pszjlaw.com](mailto:bmichael@pszjlaw.com)

*Counsel for the Official Committee of Unsecured Creditors*

BURNS BAIR LLP

/s/ Timothy W. Burns

Timothy W. Burns, Esq. (admitted *pro hac vice*)  
Jesse J. Bair, Esq. (admitted *pro hac vice*)  
10 E. Doty St., Suite 600  
Madison, WI 53703-3392  
Telephone: (608) 286-2808  
Email: [tburns@burnsbair.com](mailto:tburns@burnsbair.com)  
Email: [jbair@burnsbair.com](mailto:jbair@burnsbair.com)

*Special Insurance Counsel to the Official Committee of Unsecured Creditors*

**EXHIBIT A**

**Declaration of Timothy W. Burns**

PACHULSKI STANG ZIEHL & JONES LLP

James I. Stang, Esq. (admitted pro hac vice)  
10100 Santa Monica, Boulevard, 11th Floor  
Los Angeles, California 90067  
Telephone: (310) 277-6910  
Facsimile: (310) 201-0760  
Email: [jstang@pszjlaw.com](mailto:jstang@pszjlaw.com)

-and-

Ilan D. Scharf, Esq.  
Karen B. Dine, Esq.  
Brittany M. Michael, Esq.  
780 Third Avenue, 36th Floor  
New York, New York 10017  
Telephone: (212) 561-7700  
Facsimile: (212) 561-7777  
Email: [ischarf@pszjlaw.com](mailto:ischarf@pszjlaw.com)  
[kdine@pszjlaw.com](mailto:kdine@pszjlaw.com)  
[bmichael@pszjlaw.com](mailto:bmichael@pszjlaw.com)

Counsel for the Official Committee  
of Unsecured Creditors of The Roman Catholic  
Diocese of Rockville Centre, New York

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:	)	Case No. 20-12345 (MG)
THE ROMAN CATHOLIC DIOCESE OF	)	Chapter 11
ROCKVILLE CENTRE, NEW YORK,	)	
Debtor. <sup>1</sup>	)	

**DECLARATION OF TIMOTHY W. BURNS IN SUPPORT OF  
NINTH INTERIM APPLICATION FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES BY  
BURNS BAIR LLP AS SPECIAL INSURANCE COUNSEL  
FOR THE PERIOD FROM JUNE 1, 2023 THROUGH SEPTEMBER 30, 2023**

---

<sup>1</sup> The Debtor in this chapter 11 case is The Roman Catholic Diocese of Rockville Centre, New York, the last four digits of its federal tax identification number are 7437, and its mailing address is 50 North Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571-9023.

I, Timothy W. Burns, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 and pursuant to Rule 2016 of the Federal Rules of Bankruptcy Procedure and Rule 2016 of the Local Rules for the Bankruptcy Court for the Southern District of New York that the following is true and correct:

i. I am a partner with the law firm of Burns Bair LLP (“Burns Bair” or the “Firm”), with offices located at 10 E. Doty Street, Suite 600, Madison, WI 53703. I am duly admitted to practice law in, among other places, the States of Wisconsin, Illinois, and Missouri.

ii. I have personally reviewed the information contained in the Application and believe its contents to be true and correct to the best of my knowledge, information, and belief. In addition, I believe that the Application complies with the Local Rules for the Southern District of New York and the *Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases*.

iii. All services for which Burns Bair requests compensation were performed for or on behalf of the Committee. Burns Bair has received no payment and no promises for payment from any source other than the Debtor for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between Burns Bair and any other person other than the partners of Burns Bair for the sharing of compensation to be received for services rendered in these cases. Burns Bair has not received a retainer in these cases.

iv. Burns Bair makes the following disclosures pursuant to the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*, effective November 1, 2013.

v. The Court authorized the Committee to retain Burns Bair as their special insurance counsel in this chapter 11 case pursuant to the *Order Authorizing and Approving The Official Committee of Unsecured Creditors' Application to Retain and Employ Burns Bair LLP as Special Insurance Counsel Effective as of October 29, 2020* (the “Retention Order”) [Docket 246]. The billing rates in this Application are those disclosed and approved at retention.

vi. Six professionals and three paraprofessionals are included in this Application. Of those professionals, three billed fewer than 15 hours during the Interim Compensation Period.

vii. In accordance with the U.S. Trustee Guidelines, Burns Bair responds to the questions identified therein as follows:

Question 1: Did Burns Bair agree to any variations from, or alternatives to, Burns Bair’s standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.

Answer: Yes. I, Timothy W. Burns, agreed to reduce my hourly rate in this matter from my standard hourly rate of \$1090 per hour to \$975 per hour.

Question 2: If the fees sought in the Application as compared to the fees budgeted for the time period covered by the Application are higher by 10% or more, did Burns Bair discuss the reasons for the variation with the client?

Answer: N/A.

Question 3: Have any of the professionals included in the Application varied their hourly rate based on geographic location of the bankruptcy case?

Answer: No.

Question 4: Does the Application include time or fees related to reviewing or revising time records or preparing, reviewing or revising invoices?

Answer: Yes, a relatively small amount of time was incurred preparing and reviewing Burns Bair's fee applications and associated exhibits, which included Burns Bair's invoices. No amount of time was incurred preparing or revising invoices other than in connection with Burns Bair's fee applications.

Question 5: Does the Application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify hours and fees.

Answer: No.

Question 6: Does the Application include any rate increases since Burns Bair's retention in these cases?

Answer: No.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: November 15, 2023

/s/ Timothy W. Burns

Timothy W. Burns

**EXHIBIT B**

**Timekeeper Summary**

**EXHIBIT B**

**Timekeeper Summary**

<b>Professional</b>	<b>Title</b>	<b>Year of Bar Admission</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Timothy W. Burns	Partner	1991	\$975.00	215.70	\$210,307.50
Timothy W. Burns – Travel Rate			\$487.50	29.20	\$14,235.00
Jesse J. Bair	Partner	2013	\$625.00	207.40	\$129,625.00
Jesse J. Bair – Travel Rate			\$312.50	33.40	\$10,437.50
Brian P. Cawley	Associate	2020	\$420.00	206.00	\$86,520.00
Nathan M. Kuenzi	Associate	2020	\$420.00	82.00	\$34,440.00
Leakhena Au	Associate	2020	\$420.00	32.50	\$13,650.00
Katie Sticklen	Associate	N/A	\$378.00	36.10	\$13,645.80
Alyssa Turgeon	Paralegal	N/A	\$360.00	2.40	\$864.00
Brenda Horn-Edwards	Paralegal	N/A	\$360.00	5.30	\$1,908.00
Karen Dempski	Paralegal	N/A	\$360.00	2.70	\$972.00
<b>Total</b>				<b>852.70</b>	<b>\$516,604.80</b>
<b>Average Billing Rate (Attorneys Only)</b>				<b>\$504.75</b>	

**EXHIBIT C**

**Expense Summary**

## EXHIBIT C

### Expense Summary

Date	Expense	Total Expenses
7/1/2023	Second Quarter 2023 PACER	\$76.50
7/19/2023	Travel meal, T. Burns	\$7.89
7/19/2023	United Airlines, T. Burns (July 19, MSN-EWR)	\$877.80
7/19/2023	Delta Airlines, Wi-Fi, J. Bair	\$15.95
7/19/2023	United Airlines, Wi-Fi, T. Burns (MSN-EWR)	\$8.00
7/19/2023	United Airlines, Wi-Fi, T. Burns (EWR-MSN)	\$8.00
7/19/2023	Uber, J. Bair	\$91.71
7/19/2023	Airport Parking, J. Bair	\$10.00
7/19/2023	Delta Airlines, J. Bair (July 19, MSN-EWR)	\$1,227.20
7/19/2023	Travel meal, J. Bair	\$15.27
7/19/2023	Taxi, J. Bair	\$66.35
9/17/2023	Uber, T. Burns (airport to hotel)	\$175.78
9/17/2023	Delta Airlines, J. Bair (MSN-LGA, Sept. 17-21)	\$967.10
9/17/2023	Hotel, T. Burns (3 nights)	\$2,181.00
9/17/2023	Travel meal, T. Burns	\$8.73
9/17/2023	United Airlines, T. Burns (MSN-EWR, Sept. 17- 22)	\$701.95
9/17/2023	Travel meal, J. Bair	\$15.91
9/17/2023	Hotel, J. Bair (3 nights)	\$2,181.00
9/18/2023	Travel meal, T. Burns	\$11.90
9/18/2023	Travel meal, T. Burns	\$1.50
9/18/2023	Travel meal, J. Bair	\$9.19
9/18/2023	Travel meal, J. Bair	\$16.28
9/18/2023	Travel meal, T. Burns	\$5.84
9/18/2023	Taxi, J. Bair and T. Burns	\$62.71
9/18/2023	Travel meal, T. Burns	\$2.62
9/19/2023	Travel meal, J. Bair	\$18.32
9/19/2023	Travel meal, T. Burns	\$18.84
9/19/2023	Travel meal, J. Bair	\$20.71
9/19/2023	Travel meal, J. Bair	\$5.63
9/19/2023	Travel meal, T. Burns	\$9.79
9/19/2023	Travel meal, T. Burns	\$4.12
9/19/2023	Travel meal, T. Burns	\$12.00
9/19/2023	Airport parking, J. Bair	\$28.00
9/19/2023	Uber, T. Burns (mediation to airport)	\$97.84
9/19/2023	Uber, J. Bair (mediation to airport)	\$157.29
9/20/2023	Delta Airlines Wi-Fi Onboard, J. Bair	\$15.95

9/20/2023	Uber, T. Burns	\$117.40
9/25/2023	Delta, J. Bair (MSN-LGA, Sept. 25-28)	\$1,217.80
9/25/2023	Hotel, J. Bair (3 nights)	\$2,409.00
9/25/2023	Taxi, J. Bair (airport to hotel)	\$93.35
9/25/2023	United Airlines, T. Burns (MSN-EWR, Sept. 25- 28)	\$1,049.80
9/25/2023	Hotel, T. Burns (3 nights)	\$2,409.00
9/25/2023	Travel meal, T. Burns	\$4.49
9/25/2023	Travel meal, J. Bair	\$22.76
9/25/2023	Uber, T. Burns (airport to hotel)	\$140.84
9/25/2023	Delta Airlines Wi-Fi Onboard, J. Bair	\$4.95
9/26/2023	Travel meal, J. Bair	\$20.90
9/26/2023	Travel meal, J. Bair	\$27.71
9/26/2023	Travel meal, T. Burns	\$19.54
9/26/2023	Uber, J. Bair and T. Burns (hotel to courthouse)	\$31.63
9/26/2023	FedEx pkg. to T. Burns (binder)	\$159.42
9/27/2023	Airport parking, T. Burns	\$30.00
9/27/2023	Travel meal, T. Burns	\$26.72
9/27/2023	Uber, T. Burns (hotel to airport)	\$173.84
9/27/2023	Travel meal, T. Burns	\$24.36
9/27/2023	Uber, J. Bair (hotel to airport)	\$167.68
9/27/2023	Airport parking, J. Bair	\$30.00
9/27/2023	Travel meal, J. Bair	\$25.50
9/28/2023	Delta Airlines, Wi-Fi Onboard, J. Bair	\$15.95
	<b>TOTAL:</b>	<b>\$17,357.31</b>

**EXHIBIT D**

**Summary of Compensation Requested by Project Category**

**EXHIBIT D**

**Summary of Compensation Requested by Project Category**

<b>Insurance Recovery Activities</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
	Timothy Burns	215.70	\$975.00	\$210,307.50
	Jesse Bair	204.50	\$625.00	\$127,812.50
	Nathan Kuenzi	78.10	\$420.00	\$32,802.00
	Brian Cawley	206.00	\$420.00	\$86,520.00
	Leakhena Au	32.50	\$420.00	\$13,650.00
	Katie Sticklen	36.10	\$378.00	\$13,645.80
	Karen Dempski	1.90	\$360.00	\$684.00
	Alyssa Turgeon	2.40	\$360.00	\$864.00
	<b>Total:</b>	<b>777.20</b>		<b>\$486,285.80</b>
<b>Fee Statements / Fee Applications</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
	Jesse Bair	2.90	\$625.00	\$1,812.50
	Nathan Kuenzi	3.90	\$420.00	\$1,638.00
	Brenda Horn-Edwards	5.30	\$360.00	\$1,908.00
	Karen Dempski	.80	\$360.00	\$288.00
	<b>Total:</b>	<b>12.90</b>		<b>\$5,646.50</b>
<b>Non-Working Travel</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
	Timothy Burns	29.20	\$487.50	\$14,235.00
	Jesse Bair	33.40	\$312.50	\$10,437.50
	<b>Total:</b>	<b>62.60</b>		<b>\$24,672.50</b>

**EXHIBIT E**

**Compensation Disclosures**

**CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES WITH FEE APPLICATIONS**

(See Guidelines C.3. for definitions of terms used in this Exhibit.)

<b>CATEGORY OF TIMEKEEPER</b> <b>(Using categories already maintained by the firm)</b>		<b>BLENDED HOURLY RATE</b>	
		<b>BILLED</b> <b>Firm timekeepers for preceding year, excluding bankruptcy*</b>	<b>BILLED</b> <b>In this fee application</b>
	Sr./Equity Partner/Shareholder	\$808.75	\$750.68
	Of Counsel	N/A	N/A
	Associate	\$420.00	\$415.75
	Paralegal	\$360.00	\$360.00
	Case Management Assistants	N/A	N/A
	All Timekeepers Aggregated	\$550.45	\$605.85

\* Represents approximate blended hourly rate for all firm timekeepers in non-bankruptcy cases for calendar year 2022. Please also note that approximately 50% of Burns Bair's hours for calendar year 2022 consisted of hours worked in contingent matters, meaning that Burns Bair tracked the hours worked (and the corresponding hourly rate) but did not bill those hours to the client.

Case Name: The Roman Catholic Diocese of Rockville Centre, New YorkCase Number: 20-12345 (MG)Applicant's Name: Burns Bair LLPDate of Application: November 15, 2023Interim or Final: Interim

**EXHIBIT F**

**Invoices**

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
[www.BurnsBair.com](http://www.BurnsBair.com)

**The Official Committee of Unsecured Creditors of The  
Roman Catholic Diocese of Rockville Centre**

**Issue Date :** 7/24/2023

**Bill # :** 01165

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

<b>Date</b>	<b>Timekeeper</b>	<b>Narrative</b>	<b>Hours</b>	<b>Amount</b>
6/1/2023	Jesse Bair	Preliminary review of the Court's Opinion denying the Diocese's motion for a preliminary injunction (.3); correspondence with state court counsel re insurance issues related to same (.1); review correspondence with B. Michael re same (.1);	0.50	\$312.50
6/1/2023	Jesse Bair	Review LMI's, Lexington's, and the Diocese's additional suggested edits to the joint status update letter to Judge Cave (.2);	0.20	\$125.00
6/1/2023	Jesse Bair	Review Judge Cave's order granting in part and denying in part the parties' discovery motions in the Arrowood district court action (.1);	0.10	\$62.50
6/1/2023	Jesse Bair	Prepare for discovery hearing in the Arrowood district court action (.2);	0.20	\$125.00
6/1/2023	Nathan Kuenzi	Analyze the Court's Opinion denying the Diocese's motion for a preliminary injunction (.5);	0.50	\$210.00
6/1/2023	Jesse Bair	Review B. Cosgrove's objection to Arrowood's subpoena (.1);	0.10	\$62.50
6/1/2023	Jesse Bair	Participate in discovery hearing in the Arrowood district court action (1.1);	1.10	\$687.50
6/2/2023	Jesse Bair	Review draft order denying the Diocese's preliminary injunction motion (.1);	0.10	\$62.50
6/2/2023	Jesse Bair	Review the Court's Order regarding proposed phase 1 discovery in the LMI district court action (.1);	0.10	\$62.50
6/3/2023	Jesse Bair	Continue analyzing the Court's Opinion denying the Diocese's motion for a preliminary injunction (1.2);	1.20	\$750.00
6/4/2023	Jesse Bair	Review correspondence with B. Michael and state court counsel re call to discuss the Court's preliminary injunction denial order (.1);	0.10	\$62.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Pg. 33 of 97	Main Document
6/5/2023	Timothy Burns	Participate in state court counsel meeting re preliminary injunction ruling and going-forward case strategy for insurance purposes (.1); participate in follow-up conference with J. Bair re same and insurance next-steps (.2);	1.30	\$1,267.50
6/5/2023	Jesse Bair	Participate in state court counsel meeting re preliminary injunction ruling and going-forward case strategy for insurance purposes (.1); participate in follow-up conference with T. Burns re same and insurance next-steps (.2);	1.30	\$812.50
6/6/2023	Alyssa Turgeon	Participate in BB team meeting re case developments and assignments (.1);	0.10	\$36.00
6/6/2023	Jesse Bair	Review correspondence with the Diocese and Evanston re revised joint letter and proposed discovery schedule (.1);	0.10	\$62.50
6/6/2023	Jesse Bair	Additional analysis re potential Arrowood Section 349 strategy (.1);	0.10	\$62.50
6/6/2023	Katie Sticklen	Participate in BB team meeting re case status and related assignments (.1);	0.10	\$37.80
6/6/2023	Timothy Burns	Participate in BB team meeting re case status and related projects (.1);	0.10	\$97.50
6/6/2023	Jesse Bair	Participate in BB team meeting re case developments and assignments (.1);	0.10	\$62.50
6/6/2023	Leakhena Au	Participate in BB team meeting re case status and related assignments (.1);	0.10	\$42.00
6/6/2023	Nathan Kuenzi	Participate in BB team meeting re case status and related projects (.1);	0.10	\$42.00
6/6/2023	Timothy Burns	Review correspondence from J. Stang re competing Plan issue (.1);	0.10	\$97.50
6/6/2023	Jesse Bair	Analyze the Court's Order sustaining the Diocese's sixth omnibus claims objection (.8);	0.80	\$500.00
6/6/2023	Jesse Bair	Review K. Dine correspondence re case status and recent developments (.1);	0.10	\$62.50
6/7/2023	Jesse Bair	Review and edit revised version of memorandum to state court counsel re motion to dismiss issues (.3);	0.30	\$187.50
6/7/2023	Jesse Bair	Participate in conference with T. Burns re Arrowood issues and strategy (.3);	0.30	\$187.50
6/7/2023	Jesse Bair	Correspondence with Arrowood and the Diocese re discovery meet and confer (.1);	0.10	\$62.50
6/7/2023	Jesse Bair	Correspondence with J. Stang re issues involving potential Section 349 claim against Arrowood (.1);	0.10	\$62.50
6/7/2023	Brian Cawley	Review materials sent by J. Bair regarding automatic stay and relief therefrom (.5); research case law re relief from stay issues in connection with potential parish insurance demand letters (2.3);	2.80	\$1,176.00

6/7/2023 Timothy Burns

Pg 34 of 97

	Participate in conference with J. Bair re Evanston district court action and Committee Plan issues (.2); review J. Bair correspondence to Arrowood re discovery meet and confer (.1); review J. Bair correspondence re motion to dismiss memorandum to state court counsel (.1); review K. Dine correspondence re CemCo action (.1); review correspondence with Evanston and the Diocese re requested dismissal without prejudice (.1); review correspondence with J. Stang re Arrowood issues (.1); review K. Dine correspondence re case status and developments (.1); analysis re additional insurance projects for case next-steps (.1); review the Diocese's suggested changes to the draft order denying the Diocese's preliminary injunction motion (.1); review K. Brown correspondence re same (.1); participate in conference with J. Bair re Arrowood issues and strategy (.3); conference with J. Bair and B. Cawley re potential parish insurance demands and motion to lift stay motion (.3); participate in call with state court counsel and J. Bair re overall case insurance strategy and next-steps (.2); participate in follow-up call with J. Stang and J. Bair re same (.4);	2.30	\$2,242.50
6/7/2023 Jesse Bair	Review the Diocese's suggested edits to the draft preliminary injunction denial order (.1);	0.10	\$62.50
6/7/2023 Jesse Bair	Review revised draft joint letter to Judge Cave re potential Phase 1 issues and discovery in the LMI district court action (.2);	0.20	\$125.00
6/7/2023 Jesse Bair	Participate in conference with T. Burns re Evanston district court action and and Committee Plan issues (.2);	0.20	\$125.00
6/7/2023 Brian Cawley	Participate in conference with T. Burns and J. Bair re potential parish insurance demands and motion to lift stay motion (.3);	0.30	\$126.00
6/7/2023 Jesse Bair	Correspondence with the Diocese re Evanston district court action status and next-steps (.1);	0.10	\$62.50
6/7/2023 Jesse Bair	Review and edit revised draft of the Committee's second amended Plan (.7);	0.70	\$437.50
6/7/2023 Jesse Bair	Participate in call with state court counsel and T. Burns re overall case insurance strategy and next-steps (.2); participate in follow-up call with J. Stang and T. Burns re same (.4);	0.60	\$375.00
6/7/2023 Jesse Bair	Participate in conference with T. Burns and B. Cawley re potential parish insurance demands and motion to lift stay motion (.3);	0.30	\$187.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Pg 35 of 97	Main Document
6/8/2023	Jesse Bair	Review agenda for weekly strategy call with PSZJ team (.1); participate in portion of weekly strategy conference with PSZJ team and T. Burns for insurance purposes re litigation and insurance strategy (1.5);	1.60	\$1,000.00
6/8/2023	Jesse Bair	Participate in detailed conference with T. Burns re next-steps re case insurance and settlement strategy (.7);	0.70	\$437.50
6/8/2023	Jesse Bair	Review additional edits from LMI, Lexington, and the Diocese to the draft joint letter to Judge Cave re proposed Phase 1 issues and discovery (.2); review final version of letter submitted to the Court (.1);	0.30	\$187.50
6/8/2023	Timothy Burns	Participate in portion of weekly strategy conference with PSZJ team and J. Bair for insurance purposes re litigation and insurance strategy (1.5); analyze the Court's Opinion denying the Diocese's preliminary injunction motion (1.4); review amended version of the Committee's Plan (1.3); participate in conference with J. Bair re next-steps re case insurance and settlement strategy (.7); participate in call with state court counsel and J. Bair re insurance case strategy (.2); participate in additional detailed conference with J. Bair re insurance litigation and settlement strategy (1.1);	6.20	\$6,045.00
6/8/2023	Jesse Bair	Begin reviewing and editing revised version of the Committee's amended disclosure statement (1.2);	1.20	\$750.00
6/8/2023	Jesse Bair	Participate in additional detailed conference with T. Burns re insurance litigation and settlement strategy (1.1);	1.10	\$687.50
6/8/2023	Jesse Bair	Review additional suggested edits from Evanston and the Diocese to the draft joint letter to the Court in the Evanston district court action re proposed discovery schedule (.1); review final version of same (.1);	0.20	\$125.00
6/8/2023	Jesse Bair	Correspondence with the Diocese re Arrowood denials of coverage (.1);	0.10	\$62.50
6/8/2023	Jesse Bair	Participate in call with T. Burns and state court counsel re insurance case strategy (.2);	0.20	\$125.00
6/8/2023	Brian Cawley	Continue researching case law re relief from stay issues in connection with potential parish insurance demand letters (3.1); begin summarizing research for inclusion in motion for relief from automatic stay (1.8); outline motion for relief from automatic stay (1.5);	6.40	\$2,688.00
6/8/2023	Jesse Bair	Correspondence with Arrowood and the Diocese re discovery meet and confer (.1);	0.10	\$62.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46 Pg. 36 of 97	Main Document
6/9/2023	Jesse Bair	Review revised version of the draft Order denying the Diocese's motion for a preliminary injunction (.1);	0.10      \$62.50
6/9/2023	Jesse Bair	Participate in state court counsel meeting re case insurance and litigation strategy (1.3); participate in portion of post-meeting conference with PSZJ and T. Burns re outcome of state court counsel meeting and next-steps re same (.4);	1.70      \$1,062.50
6/9/2023	Jesse Bair	Draft PowerPoint presentation re proposed insurance strategy for use during upcoming state court counsel meeting (.6); participate in conference with T. Burns re same and preparations for meeting (.7);	1.30      \$812.50
6/9/2023	Brian Cawley	Continue researching case law re relief from stay issues in connection with potential parish insurance demand letters (2.7);	2.70      \$1,134.00
6/9/2023	Timothy Burns	Prepare for state court counsel meeting re insurance strategy and next-steps (1.0); revise and edit insurance PowerPoint presentation for use during same (.6); participate in conference with J. Bair re PowerPoint presentation and preparations for state court counsel insurance meeting (.7); participate in state court counsel meeting re case insurance strategy (1.3); participate in portion of post-meeting conference with PSZJ and J. Bair re outcome of state court counsel meeting and next-steps re same (.4); conference with J. Bair re insurance meeting with the Diocese (.1); review correspondence from B. Michael re agenda for upcoming PSZJ team strategy meeting (.1); review correspondence from the Diocese re Arrowood denials of coverage (.1);	4.30      \$4,192.50
6/9/2023	Jesse Bair	Correspondence with the Diocese re call to discuss case insurance issues (.1); participate in conference with T. Burns re same (.1);	0.20      \$125.00
6/9/2023	Jesse Bair	Review summary re Arrowood coverage denials of parishes and affiliated entities (.1);	0.10      \$62.50
6/10/2023	Jesse Bair	Review B. Michael correspondence re agenda for upcoming team meeting re case litigation strategy (.1);	0.10      \$62.50
6/10/2023	Timothy Burns	Review C. Moore deposition notice re the Committee's motion to dismiss (.1); review correspondence from Reed Smith re insurance meeting with the Diocese (.1); review correspondence with the Diocese and PSZJ re draft preliminary injunction order (.1);	0.30      \$292.50
6/11/2023	Brian Cawley	Begin drafting motion for relief from stay in connection with potential parish insurance demand letters (2.1);	2.10      \$882.00

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Pg. 37 of 97	Main Document
6/12/2023	Jesse Bair	Participate in BB team meeting re case developments and ongoing projects (.1);	0.10	\$62.50
6/12/2023	Brian Cawley	Participate in BB team meeting regarding case status and related assignments (.1);	0.10	\$42.00
6/12/2023	Timothy Burns	Participate in call with J. Stang re issues re Delaware regulatory supervision of Arrowood (.2); participate in call with J. Bair re same (.2);	0.40	\$390.00
6/12/2023	Jesse Bair	Review T. Burns correspondence re Arrowood strategy (.1);	0.10	\$62.50
6/12/2023	Jesse Bair	Participate in conference with Reed Smith and T. Burns re Arrowood issues (.6); post-call discussion with T. Burns re outcome of same and next-steps (.2);	0.80	\$500.00
6/12/2023	Brian Cawley	Continue researching case law re relief from stay issues in connection with potential parish insurance demand letters (3.4); continue drafting motion for relief from automatic stay in connection with same (4.0);	7.40	\$3,108.00
6/12/2023	Nathan Kuenzi	Participate in BB team meeting re case developments and assignments (.1);	0.10	\$42.00
6/12/2023	Jesse Bair	Participate in conference with T. Burns re Arrowood strategy and preparations for upcoming call with Reed Smith re Arrowood issues (.4);	0.40	\$250.00
6/12/2023	Jesse Bair	Review Judge Cave's Orders re upcoming discovery status conferences in the LMI and Evanston district court actions (.1);	0.10	\$62.50
6/12/2023	Timothy Burns	Review and respond to correspondence re Arrowood strategy (.2); participate in BB team meeting re case developments and ongoing projects (.1); conference with J. Bair re Arrowood strategy and upcoming call with Reed Smith re Arrowood issues (.4); review and respond to correspondence from state court counsel re Arrowood issues (.2); conference with J. Bair re writ action against Arrowood in Delaware (.1); participate in call with state court counsel re developments re Arrowood (.1); participate in conference with Reed Smith and J. Bair re Arrowood issues (.6); participate in post-call discussion with T. Burns re outcome of same and next-steps (.2); review J. Bair insurance statute update correspondence to PSZJ team (.1); review various correspondence with Reed Smith, LMI, and Lexington re hearing on discovery in insurance district court proceeding (.2); review proposed Order adjourning discovery hearing in LMI/Lexington insurance district court proceeding (.1);	2.30	\$2,242.50
6/12/2023	Katie Sticklen	Participate in BB team meeting regarding case status and related assignments (.1);	0.10	\$37.80

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46 Pg. 38 of 97	Main Document
6/12/2023	Alyssa Turgeon	Participate in BB team meeting re case developments and ongoing projects (.1);	0.10      \$36.00
6/12/2023	Jesse Bair	Review proposed Order adjourning the LMI discovery status conference and related correspondence with LMI and the Diocese re same (.1);	0.10      \$62.50
6/12/2023	Jesse Bair	Review K. Dine correspondence re case developments and next-steps (.1);	0.10      \$62.50
6/12/2023	Jesse Bair	Participate in conference with T. Burns re status of Diocese of Brooklyn's writ action against Arrowood in Delaware (.1); conference with B. Cawley re additional materials needed in connection with same (.1);	0.20      \$125.00
6/12/2023	Jesse Bair	Participate in call with T. Burns re issues re Delaware regulatory supervision of Arrowood (.2);	0.20      \$125.00
6/12/2023	Jesse Bair	Draft insurance status update email to PSZJ team re recent call with Reed Smith re Arrowood and other insurance issues (.3);	0.30      \$187.50
6/13/2023	Jesse Bair	Prepare for discovery meet and confer with Arrowood and the Diocese (.4); participate in discovery meet and confer with Arrowood and the Diocese (.5);	0.90      \$562.50
6/13/2023	Jesse Bair	Review monthly Diocese PSIP report (.1);	0.10      \$62.50
6/13/2023	Jesse Bair	Participate in portion of PSZJ team strategy meeting for insurance purposes re mediation, litigation, and settlement strategy (1.2) ; participate in post-meeting call with T. Burns re insurance next-steps (.1);	1.30      \$812.50
6/13/2023	Brian Cawley	Finalize motion to lift the stay in connection with potential parish insurance demand letters (1.3); review preliminary feedback on draft from T. Burns (.2); conference with J. Bair re suggested revisions to draft motion (.2); implement partner feedback in draft (2.8);	4.50      \$1,890.00
6/13/2023	Jesse Bair	Analyze and respond to Claro questions re operation of certain Arrowood policies (.2);	0.20      \$125.00
6/13/2023	Jesse Bair	Review revised version of adjournment letter of LMI/Lexington discovery conference and related correspondence (.1);	0.10      \$62.50
6/13/2023	Jesse Bair	Participate in call with T. Burns re discovery meet and confer outcome, Arrowood strategy, and overall insurance strategy (.4);	0.40      \$250.00
6/13/2023	Jesse Bair	Preliminary review re draft motion to lift stay in connection with potential insurance demand letters (.3); conference with B. Cawley re suggested edits to same (.2);	0.50      \$312.50
6/13/2023	Jesse Bair	Revise and edit draft Section 349 complaint against Arrowood (.1); correspondence with Reed Smith re same (.2);	0.30      \$187.50

20-12345-mg Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Main Document
6/13/2023 Jesse Bair	Pg 39 of 97 Participate in call with T. Burns re Arrowood strategy (.1);	0.10 \$62.50
6/13/2023 Timothy Burns	Review docket order from Mag. Judge Cave re July 15 hearing on discovery issues (.1); review case dockets of Delaware and NC actions involving Arrowood (.2); review Diocese PSIP monthly report (.1); review and revise draft motion to lift stay in connection with potential insurance demand letters (.8); review J. Bair correspondence to Reed Smith re draft Section 349 complaint against Arrowood (.1); participate in call with J. Bair re Arrowood strategy (.1); review materials re Arrowood's Delaware regulatory supervision from writ of mandamus proceeding in Delaware and unfair business practices action in North Carolina (1.2); participate in call with B. Cawley re Arrowood research project (.2); participate in call with J. Bair re meet and confer outcome, Arrowood strategy, and overall insurance strategy (.4); participate in portion of PSZJ team strategy meeting for insurance purposes re mediation, litigation, and settlement strategy (1.2); participate in post-meeting call with J. Bair re insurance next-steps (.1);	4.50 \$4,387.50
6/13/2023 Brian Cawley	Research constitutional right to petition in context of automatic stay (.8); draft email summarizing right to petition research for T. Burns (.5);	1.30 \$546.00
6/13/2023 Jesse Bair	Continue reviewing and editing the Committee's second amended disclosure statement (.7);	0.70 \$437.50
6/13/2023 Jesse Bair	Review motion to dismiss scheduling order (.1);	0.10 \$62.50
6/13/2023 Brian Cawley	Analysis of relevant pleadings and motions filed in the unfair business practices action against Arrowood in North Carolina and the writ of mandamus action involving Arrowood in Delaware (1.1);	1.10 \$462.00
6/14/2023 Brian Cawley	Discuss new research assignment on Delaware duty to settle with J. Bair (.2); research contours of Delaware duty to settle law (2.9);	3.10 \$1,302.00
6/14/2023 Jesse Bair	Analysis re insurer demand letter issues (.1); correspondence with B. Michael re same (.1);	0.20 \$125.00
6/14/2023 Jesse Bair	Analysis re Delaware duty to settle law in connection with Arrowood strategy (.1); participate in conference with B. Cawley re same and additional research needed (.2);	0.30 \$187.50
6/14/2023 Jesse Bair	Analysis re Arrowood claims monitor information (.1); participate in conference with T. Burns re same (.1);	0.20 \$125.00
6/14/2023 Brian Cawley	Additional analysis of relevant pleadings and motions from Delaware writ of mandamus action involving Arrowood (1.0);	1.00 \$420.00

20-12345-mg Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Main Document
6/14/2023 Timothy Burns	Pg 40 of 97 Review Committee motion to amend claims objections procedures and related papers (.2); review letter from C. Ball re same (.1); detailed review of Arrowood materials from Delaware writ proceeding and North Carolina unfair business practices proceeding (2.6);	2.90 \$2,827.50
6/15/2023 Timothy Burns	Participate in calls with state court counsel re Arrowood strategy (.6); participate in call with J. Bair re same (.1);	0.70 \$682.50
6/15/2023 Jesse Bair	Prepare for discovery hearing in the LMI district court action (.1); participate in discovery hearing in the LMI district court action (.6);	0.70 \$437.50
6/15/2023 Nathan Kuenzi	Begin supplemental analysis re New York and Delaware Guarantee Funds in connection with Arrowood strategy (1.0);	1.00 \$420.00
6/15/2023 Nathan Kuenzi	Research and analyze particular issues under New York and Delaware law involving New York and Delaware guaranty funds and approach of sexual abuse claimants to obtaining recovery under those funds (4.8);	4.80 \$2,016.00
6/15/2023 Jesse Bair	Participate in call with T. Burns re Arrowood strategy (.1);	0.10 \$62.50
6/15/2023 Brian Cawley	Continue researching Delaware law re insurer duty to settle issues (3.5); begin drafting summary of Delaware duty to settle issues (.7);	4.20 \$1,764.00
6/16/2023 Nathan Kuenzi	Draft summary for T. Burns re guarantee fund research results (1.4);	1.40 \$588.00
6/16/2023 Jesse Bair	Prepare for state court counsel meeting (.2); participate in state court counsel meeting for insurance purposes re case litigation and settlement strategy (.6);	0.80 \$500.00
6/16/2023 Nathan Kuenzi	Continue researching and analyzing particular issues under New York and Delaware law involving New York and Delaware guaranty funds and approach of sexual abuse claimants to obtaining recovery under those funds (2.6);	2.60 \$1,092.00
6/16/2023 Jesse Bair	Review Reed Smith correspondence re potential section 349 complaint against Arrowood (.1); conference with T. Burns re same (.1);	0.20 \$125.00
6/16/2023 Brian Cawley	Continue researching duty to settle issues under Delaware law (1.0); continue drafting summary of research results and send to T. Burns and J. Bair (.7);	1.70 \$714.00
6/16/2023 Timothy Burns	Analyze the Diocese's response to request to bring Section 349 GBL action against Arrowood (.2); conference with J. Bair re same (.1); prepare for state court counsel meeting (.2); participate in state court counsel meeting for insurance purposes re case litigation and settlement strategy (.6);	1.10 \$1,072.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46		Main Document
		Pg 41 of 97		
6/16/2023	Jesse Bair	Prepare for discovery hearing in the Evanston district court action (.1); participate in discovery hearing in the Evanston district court action (.4);	0.50	\$312.50
6/19/2023	Jesse Bair	Review Arrowood's letter to Judge Cave re Cosgrove subpoena resolution (.1);	0.10	\$62.50
6/19/2023	Jesse Bair	Analysis re Arrowood claim count (.2); correspondence with T. Burns re same (.1);	0.30	\$187.50
6/19/2023	Timothy Burns	Review B. Michael correspondence re Committee meeting and agenda (.1); review Phase 1 discovery order in LMI district court action (.1); review Arrowood letter to Court re Cosgrove deposition and endorsement of Court (.1); reviewed Pfau firm's response to 11th Claims Objection and Amala declaration (.2); reviewed Slater firm's response to 11th Claims Objection (.1); reviewed Merson declaration re 12th Claims Objection (.1); reviewed Gair firm's joinder to motion to dismiss (.1); review Ketterer firm's opposition to 12th Claims Objection (.2); reviewed Debtor's deposition notices of Amala and D'Estries (.1); reviewed correspondence from B. Michael re unstayed cases (.1); review J. Cave's order re stay in Evanston district court action (.1); review LMI's response to the Committee's Insurance Law Section 3420 letter (.1); review J. Cave's minute entry re Evanston hearing (.1); review J. Bair memo re unstayed cases (.1); review information provided by Reed Smith re changes to Section 349 of the GBL (.2); review B. Cawley's Arrowood related research memo (.2); review N. Kuenzi's Arrowood related research memos (.2); review the Committee's deposition notice of Diocese (.1); review Ninth Omnibus Objection Order (.1); review Sixth Omnibus Claims Objection Order (.1); review revised version of draft motion to lift stay in connection with potential parish insurance demands (.3); review 13th Omnibus Objection (.3); review 14th Omnibus Objection (.2); review 15th Omnibus Claims Objection (.2); review First Amended Stipulation and Agreed Scheduling Order (.1); review the Committee's meet-and-confer letter re claims objections procedures (.1); prepared note to file re 6/16/23 State Court Counsel call (.3); review late notice and expected/intended research (.5); review notice of propensity to abuse research (.5);	5.00	\$4,875.00
6/19/2023	Jesse Bair	Review discovery order entered in the Evanston District Court action (.1);	0.10	\$62.50
6/19/2023	Jesse Bair	Review LMI's response to the Committee Section 3420 notice letter (.1);	0.10	\$62.50
6/19/2023	Jesse Bair	Review discovery order entered in the LMI District Court action (.1);	0.10	\$62.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Main Document
6/19/2023 Jesse Bair	Pg 42 of 97 Review agenda for upcoming Committee meeting (.1);	0.10	\$62.50
6/20/2023 Timothy Burns	Conference with J. Bair re insurance mediation strategy and Arrowood issues (.2); participate in Committee meeting for insurance purposes re case developments and strategy (.7);	0.90	\$877.50
6/20/2023 Jesse Bair	Review the Diocese's objection to the Committee's motion to amend the claim objections procedures order (.2);	0.20	\$125.00
6/20/2023 Jesse Bair	Participate in state court counsel meeting for insurance purposes re case developments and strategy (.7);	0.70	\$437.50
6/20/2023 Jesse Bair	Participate in conference with T. Burns re mediation strategy and Arrowood issues (.2);	0.20	\$125.00
6/21/2023 Leakhena Au	Review grand jury report and summarize expected or intended issues re the parishes (2.1);	2.10	\$882.00
6/21/2023 Jesse Bair	Review the Diocese's letter to the Court re scope of notice discovery (.1); review the Committee's response to same (.1);	0.20	\$125.00
6/21/2023 Jesse Bair	Analysis re insurance demand letter issues (.1); participate in call with B. Michael re same (.4);	0.50	\$312.50
6/21/2023 Jesse Bair	Review prior analysis re expected or intended issues (.1); provide instructions to L. Au re supplemental analysis needed in connection with same (.1);	0.20	\$125.00
6/22/2023 Leakhena Au	Continue reviewing grand jury report, summarize expected or intended issues related to the parishes, and send findings to J. Bair (1.5);	1.50	\$630.00
6/22/2023 Jesse Bair	Review N. Kuenzi email memorandum re Delaware unfair claims handling rules in connection with Arrowood strategy (.2);	0.20	\$125.00
6/22/2023 Timothy Burns	Review L. Au's notice/knowledge memo (.2); review agenda for weekly strategy call with PSZJ (.1); review the Diocese's objection to motion to amend claims objections procedures (.2); review letter to the Court from the Diocese re scope of notice discovery (.2); review the Committee's response letter (.1);	0.80	\$780.00
6/22/2023 Jesse Bair	Review correspondence with B. Michael and state court counsel re motion to dismiss hearing issues (.1);	0.10	\$62.50
6/22/2023 Jesse Bair	Review L. Au email memorandum re parameters of Committee intervention rights in connection with Arrowood district court action (.1);	0.10	\$62.50
6/22/2023 Jesse Bair	Review agenda for weekly strategy call with PSZJ (.1);	0.10	\$62.50
6/23/2023 Jesse Bair	Correspondence with B. Michael re insurance demand letter issues (.2);	0.20	\$125.00

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46 Pg 43 of 97	Main Document
6/23/2023 Jesse Bair		Review and consider L. Au's supplemental expected or intended analysis (.4);	0.40      \$250.00
6/23/2023 Jesse Bair		Preliminary analysis re Interstate's responses to the Committee's Section 3420 notice letter (.2);	0.20      \$125.00
6/23/2023 Jesse Bair		Review the Diocese's reply in support of its 11th omnibus claims objection re BSA claims (.1);	0.10      \$62.50
6/23/2023 Timothy Burns		Review correspondence with PSZJ and state court counsel re motion to dismiss hearing (.1);	0.10      \$97.50
6/23/2023 Jesse Bair		Additional analysis re LMI's response to the Committee's Section 3420 notice letter (.1); correspond with LMI re same (.1);	0.20      \$125.00
6/23/2023 Jesse Bair		Review the Committee's reply in support of its motion to amend claims objections procedures order (.1);	0.10      \$62.50
6/23/2023 Karen Dempski		Draft monthly BB fee statement (.6); generate and edit Exhibit A to same (.1); correspond with J. Bair re same (.1);	0.80      \$288.00
6/26/2023 Brian Cawley		Correspond with J. Bair regarding Interstate coverage letter review project (.2); begin analyzing each individual coverage position letter sent by Interstate to state court counsel (1.4);	1.60      \$672.00
6/26/2023 Jesse Bair		Additional analysis of Interstate's responses to the Committee's Section 3420 notice letter (.2); provide instructions to N. Kuenzi and B. Cawley re supplemental analysis needed in connection with same (.2);	0.40      \$250.00
6/26/2023 Jesse Bair		Participate in conference with T. Burns re case developments and insurance next-steps (.1);	0.10      \$62.50
6/26/2023 Nathan Kuenzi		Review correspondence with J. Bair regarding Interstate coverage letter review project (.2); begin analyzing each individual coverage position letter sent by Interstate to state court counsel (1.6);	1.80      \$756.00
6/26/2023 Jesse Bair		Review correspondence with J. Stang and state court counsel re parish stay issues (.1);	0.10      \$62.50
6/26/2023 Jesse Bair		Review Lexington's' response to the Committee's Section 3420 notice letter (.2);	0.20      \$125.00
6/26/2023 Timothy Burns		Participate in conference with J. Bair re case developments and insurance next-steps (.1);	0.10      \$97.50
6/27/2023 Nathan Kuenzi		Analyze issues raised by partial denial and reservation of rights in review of Interstate coverage position letters (1.3);	1.30      \$546.00
6/27/2023 Timothy Burns		Review correspondence re removal issues (.2); review correspondence re claims objection hearing (.2); review correspondence with Arrowood re protective order (.2);	0.60      \$585.00
6/27/2023 Jesse Bair		Answer B. Cawley questions re analysis of Interstate coverage position letters (.1);	0.10      \$62.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Pg. 44 of 97	Main Document
6/27/2023 Jesse Bair		Review draft joint letter to Judge Cave re proposed confidentiality agreement in the Arrowood district court action (.1); review draft confidentially stipulation (.1); correspondence with the Diocese and Arrowood re same (.1);	0.30	\$187.50
6/27/2023 Brian Cawley		Continue analyzing each individual coverage position letter sent by Interstate to state court counsel (5.6);	5.60	\$2,352.00
6/27/2023 Katie Sticklen		Discuss Interstate coverage letter review project with B. Cawley (.7); begin analyzing each individual coverage position letter sent by Interstate to state court counsel (2.2);	2.90	\$1,096.20
6/27/2023 Jesse Bair		Correspondence with B. Horn re BB's eighth interim fee application (.2);	0.20	\$125.00
6/27/2023 Jesse Bair		Review correspondence from B. Michael re motion to dismiss hearing issues (.1);	0.10	\$62.50
6/27/2023 Brian Cawley		Discuss Interstate coverage letter review project with K. Sticklen (.7);	0.70	\$294.00
6/28/2023 Katie Sticklen		Continue analyzing each individual coverage position letter sent by Interstate to state court counsel (4.7);	4.70	\$1,776.60
6/28/2023 Jesse Bair		Review final version of the Arrowood district court action confidentiality stipulation and protective order (.1);	0.10	\$62.50
6/28/2023 Brian Cawley		Continue analyzing each individual coverage position letter sent by Interstate to state court counsel (4.0);	4.00	\$1,680.00
6/29/2023 Brenda Horn-Edwards		Draft BB eighth interim fee application (1.6); revise declaration of T. Burns re same (.2); draft exhibits to same (.8); correspond with J. Bair re same (.1);	2.70	\$972.00
6/29/2023 Jesse Bair		Review the Diocese's opposition to the Committee's motion to dismiss (.5); conference with T. Burns re same (.1);	0.60	\$375.00
6/29/2023 Brian Cawley		Finalize summary of Interstate coverage position letters sent to state court counsel (2.2);	2.20	\$924.00
6/29/2023 Jesse Bair		Review Arrowood's response to the Committee's Section 3420 notice letter (.2);	0.20	\$125.00
6/29/2023 Jesse Bair		Review the parties' joint status letter to Judge Rochon in the Arrowood district court action (.1);	0.10	\$62.50
6/29/2023 Jesse Bair		Review the future claims representative's opposition to the Committee's motion to dismiss (.3);	0.30	\$187.50
6/29/2023 Jesse Bair		Review draft of the Committee's reply in support of its motion to dismiss (.3);	0.30	\$187.50
6/29/2023 Timothy Burns		Conference with J. Bair re the Diocese's opposition to the Committee's motion to dismiss (.1);	0.10	\$97.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Pg 45 of 97	Main Document
6/30/2023 Jesse Bair		Review correspondence with the mediator re Arrowood claims monitor issues (.1); review Delaware regulator order in connection with same (.1);	0.20	\$125.00
6/30/2023 Jesse Bair		Review suggested addendum to the case protective order provided by Arrowood (.1);	0.10	\$62.50
6/30/2023 Jesse Bair		Review K. Dine correspondence re motion to dismiss update (.1);	0.10	\$62.50
6/30/2023 Jesse Bair		Review P. Shields declaration in support of the Committee's motion to dismiss (.1);	0.10	\$62.50
6/30/2023 Brenda Horn-Edwards		Revise BB eighth interim fee application (.1);	0.10	\$36.00
6/30/2023 Jesse Bair		Review J. Amala declaration in support of the Committee's motion to dismiss (.1);	0.10	\$62.50
6/30/2023 Jesse Bair		Review Judge Rochon's Order adjourning the post-discovery hearing in the Arrowood district court action (.1);	0.10	\$62.50
6/30/2023 Jesse Bair		Review P. Stoneking declaration in support of the Committee's motion to dismiss (.1);	0.10	\$62.50
6/30/2023 Timothy Burns		Correspondence with the mediator re Arrowood claims monitor issues (.1); review correspondence with J. Bair and Arrowood re protective order in district court proceeding (.1);	0.20	\$195.00
6/30/2023 Jesse Bair		Review C. d'Estries declaration in support of the Committee's motion to dismiss (.1);	0.10	\$62.50

<b>Total Hours and Fees</b>	<b>152.80</b>	<b>\$90,200.90</b>
-----------------------------	---------------	--------------------

#### Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alyssa Turgeon	0.20	\$360.00	\$72.00
Brenda Horn-Edwards	2.80	\$360.00	\$1,008.00
Brian Cawley	52.80	\$420.00	\$22,176.00
Jesse Bair	36.80	\$625.00	\$23,000.00
Karen Dempski	0.80	\$360.00	\$288.00
Katie Sticklen	7.80	\$378.00	\$2,948.40
Leakhena Au	3.70	\$420.00	\$1,554.00
Nathan Kuenzi	13.60	\$420.00	\$5,712.00
Timothy Burns	34.30	\$975.00	\$33,442.50

**Total Due This Invoice: \$90,200.90**

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
[www.BurnsBair.com](http://www.BurnsBair.com)

**The Official Committee of Unsecured Creditors  
of The Roman Catholic Diocese of Rockville  
Centre**

**Issue Date :** 8/27/2023  
**Bill # :** 01191

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

<b>Date</b>	<b>Timekeeper</b>	<b>Narrative</b>	<b>Hours</b>	<b>Amount</b>
7/3/2023	Jesse Bair	Review C. Moore's direct testimony in opposition to the Committee's motion to dismiss (.3);	0.30	\$187.50
7/3/2023	Jesse Bair	Review state court counsel opposition to the Diocese's thirteenth omnibus claims objection (.4);	0.40	\$250.00
7/5/2023	Jesse Bair	Review the Committee's motion to exclude the Diocese's motion to dismiss expert testimony (.3);	0.30	\$187.50
7/5/2023	Jesse Bair	Review the North Carolina trial court's decision dismissing the Diocese of Brooklyn's unfair claims practices lawsuit against Arrowood's parent company and directors and officers (.2);	0.20	\$125.00
7/5/2023	Jesse Bair	Review Arrowood's letter to the Court re proposed amendment to case protective order (.1);	0.10	\$62.50
7/5/2023	Timothy Burns	Reviewed motion in limine re Moore's testimony for insurance purposes (.4); reviewed Dec. of Stuart Mermelstein supporting objection to 13th Claims Objection and objection related thereto (.4); reviewed Dec. of Stuart Mermelstein supporting objection to 15th Claims Objection and objection related thereto (.4); reviewed Anderson Firm's Objection to the Debtor's Thirteenth Omnibus Objection (.5); reviewed Debtor's motion for extension of the removal period (.2);	1.90	\$1,852.50
7/5/2023	Jesse Bair	Draft email memorandum to J. Stang summarizing the current status of each of the four insurance district court actions (1.0);	1.00	\$625.00
7/5/2023	Jesse Bair	Correspondence with I. Nasatir re recent Diocesan insurance activities (.1);	0.10	\$62.50

7/5/2023	Jesse Bair	Review the Delaware Insurance Department's motion to dismiss the Diocese of Brooklyn's mandamus action to put Arrowood into liquidation (.3);	0.30	\$187.50
7/6/2023	Jesse Bair	Participate in call with I. Nasatir, G. Greenwood, and T. Burns re case update and Arrowood issues (.3);	0.30	\$187.50
7/6/2023	Jesse Bair	Review the Diocese's motion to exclude the Committee's state court counsel joinder evidence (.3);	0.30	\$187.50
7/6/2023	Jesse Bair	Review the parties' joint pre-trial order (.2);	0.20	\$125.00
7/6/2023	Jesse Bair	Review correspondence with I. Nasatir re insurance issues in connection with the upcoming motion to dismiss hearing (.1);	0.10	\$62.50
7/6/2023	Timothy Burns	Met with J. Bair re removal issue and impact on insurance issues (.1); brief research re collective settlements (.4); met with J. Bair re duty to settle research and plan issues (.5); meet with K. Sticklen and J. Bair re research assignment re same (.3); reviewed Restatement of Liability Insurance sections concerning duty to settle (.8); participate in call with I. Nasatir, G. Greenwood, and J. Bair re Arrowood issues (.3); reviewed joint pretrial order (.2); reviewed BB status update on adversary proceeding insurance litigation (.1); reviewed emails between BB and PSZJ re Arrowood developments (.1); reviewed I. Nasatir email re Diocese insurance activities (.1);	2.90	\$2,827.50
7/6/2023	Jesse Bair	Review final version of addendum to Arrowood protective order (.1);	0.10	\$62.50
7/6/2023	Brian Cawley	Analysis re recent developments in Delaware mandamus action against Arrowood (.3);	0.30	\$126.00
7/6/2023	Jesse Bair	Participate in conference with T. Burns re case status, removal issue, and next-steps re insurance actions (.1);	0.10	\$62.50
7/6/2023	Jesse Bair	Participate in additional conference with T. Burns re duty to settle research and potential Plan issues (.5); participate in follow-up meeting K. Sticklen and T. Burns re research assignment re same (.3);	0.80	\$500.00

7/7/2023 Timothy Burns

Pg 48 of 97

		PARTICIPATE IN STATE COURT MEETING RE MOTION TO DISMISS ISSUES FOR INSURANCE PURPOSES (.6); REVIEWED DEBTOR'S MOTION IN LIMINE RE RECOMMENDATIONS MADE BY CLAIMANTS' COUNSEL (.4); REVIEWED JOINT PETITION TO FIX VENUE (.6); REVIEWED ORDER DENYING MOTIONS IN LIMINE (.1); REVIEWED SUSSI-PABILONIA MOTION TO REMAND FOR INSURANCE PURPOSES (.4); REVIEWED D'ESTRIES, SHIELDS, STONEKING, AND AMALA MOTION TO DISMISS WITNESS STATEMENTS FOR INSURANCE PURPOSES (.9); PARTICIPATE IN CONFERENCE WITH J. BAIR AND K. STICKLEN RE PRELIMINARY RESEARCH RESULTS RE POST-CONFIRMATION TRUST DUTY TO SETTLE CAUSES OF ACTION (.2);	3.20	\$3,120.00
7/7/2023	Jesse Bair	PARTICIPATE IN STATE COURT COUNSEL MEETING RE MOTION TO DISMISS ISSUES FOR INSURANCE PURPOSES (.6);	0.60	\$375.00
7/7/2023	Jesse Bair	PARTICIPATE IN CONFERENCE WITH T. BURNS AND K. STICKLEN RE PRELIMINARY RESEARCH RESULTS RE POST-CONFIRMATION TRUST DUTY TO SETTLE CAUSES OF ACTION (.2);	0.20	\$125.00
7/7/2023	Katie Sticklen	RESEARCH AND ANALYZE NEW YORK CASE LAW RE ACCRUAL OF FAILURE TO SETTLE CLAIM UNDER DIFFERENT CIRCUMSTANCES (2.6); DISCUSS RESEARCH FINDINGS WITH B. CAWLEY AND POTENTIAL FOLLOW-UP ANALYSIS (.5); DRAFT EMAIL MEMORANDUM TO T. BURNS AND J. BAIR RE PRELIMINARY RESEARCH RESULTS RE ACCRUAL OF FAILURE TO SETTLE CLAIM UNDER DIFFERENT SCENARIOS (.4);	3.50	\$1,323.00
7/7/2023	Jesse Bair	REVIEW AND EDIT BB'S EIGHTH INTERIM FEE APPLICATION (1.9); REVIEW AND RESPOND TO CORRESPONDENCE WITH B. HORN RE ADDITIONAL CHANGES NEEDED TO SAME (.2);	2.10	\$1,312.50
7/7/2023	Brian Cawley	PARTICIPATE IN CONFERENCE WITH K. STICKLEN RE PRELIMINARY RESEARCH RESULTS AND POTENTIAL FOLLOW-UP ANALYSIS RE SAME (.5); SUPPLEMENTAL LEGAL RESEARCH IN CONNECTION WITH SAME (.8);	1.30	\$546.00
7/7/2023	Jesse Bair	REVIEW VARIOUS CORRESPONDENCE WITH PSZJ AND CLARO RE INSURANCE ALLOCATION ISSUES IN CONNECTION WITH UPCOMING MOTION TO DISMISS HEARING (.2);	0.20	\$125.00
7/7/2023	Brenda Horn-Edwards	REVISE BB EIGHTH INTERIM FEE APPLICATION (.2);	0.20	\$72.00
7/7/2023	Jesse Bair	REVIEW ORDER DENYING THE PARTIES' PRE-TRIAL MOTIONS IN LIMINE (.1);	0.10	\$62.50
7/7/2023	Jesse Bair	ADDITIONAL ANALYSIS RE RECENT DIOCESAN INSURANCE ACTIVITIES (.2);	0.20	\$125.00
7/8/2023	Jesse Bair	REVIEW CORRESPONDENCE WITH CLARO RE REVISED INSURER EXPOSURE AND ALLOCATION FIGURES (.1);	0.10	\$62.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Main Document
7/10/2023 Jesse Bair	Pg 49 of 97		
7/10/2023 Jesse Bair	Participate in call with T. Burns re outcome of day 1 of motion to dismiss hearing and insurance issues and next-steps in connection with same (.4);	0.40	\$250.00
7/10/2023 Jesse Bair	Respond to LMI correspondence re LMI's production of additional coverage position letters in response to the Committee's Section 3420 notice letter (.1);	0.10	\$62.50
7/10/2023 Leakhena Au	Participate in conference with T. Burns re assignment re drafting letters to the insurers and the Diocese re insurance negotiations without Committee involvement (.2); draft letters to the insurers and the Diocese re same (4.2);	4.40	\$1,848.00
7/10/2023 Timothy Burns	Attended motion to dismiss hearing for insurance purposes (3.9); participate in call with J. Bair re insurance issues re same (.4); met with L. Au re insurance assignment re same (.2); reviewed correspondence from J. Bair to J. Moffitt re LMI reservation/denial letters (.1); reviewed and revised draft letters to the insurers and the Diocese re settlement negotiations without Committee involvement (.8);	5.40	\$5,265.00
7/10/2023 Jesse Bair	Attend motion to dismiss hearing for insurance purposes (3.9);	3.90	\$2,437.50
7/10/2023 Jesse Bair	Correspondence with L. Au and T. Burns re draft letters to the Diocese and the insurers re potential insurance settlement without Committee involvement (.1);	0.10	\$62.50
7/10/2023 Jesse Bair	Analyze and respond to J. Stang questions re history and status of Committee and insurer settlement offers (.3);	0.30	\$187.50
7/10/2023 Katie Sticklen	Supplemental research and analysis of New York case law re accrual of failure to settle claim under different circumstances (1.6); draft email memorandum to T. Burns and J. Bair summarizing same (.3);	1.90	\$718.20
7/10/2023 Nathan Kuenzi	Review analysis of claim numbers and estimates of insurer exposure to assist L. Au in preparation of letters to insurers (.2);	0.20	\$84.00
7/11/2023 Jesse Bair	Participate in call with T. Burns re insurance strategy post-motion to dismiss hearing (.2);	0.20	\$125.00
7/11/2023 Leakhena Au	Revise letters to the Diocese and insurers based on feedback from partners re non-consensual insurance settlements (1.3);	1.30	\$546.00
7/11/2023 Jesse Bair	Participate in Committee meeting for insurance purposes re motion to dismiss hearing outcome and next-steps (.8);	0.80	\$500.00
7/11/2023 Jesse Bair	Attend day 2 of motion to dismiss hearing for insurance purposes (4.3);	4.30	\$2,687.50

7/11/2023 Jesse Bair

Pg 50 of 97

7/11/2023 Timothy Burns

Analysis re additional insurance questions in connection with motion to dismiss hearing from J. Stang (.1); review correspondence from I. Nasatir, K. Dine, and T. Burns re same (.2); respond to insurance question from J. Stang (.1);

0.40

\$250.00

7/12/2023 Jesse Bair

Reviewed and responded to emails of committee professionals re insurance issues re motion to dismiss hearing (.4); attended day 2 of motion to dismiss hearing for insurance purposes (4.3); reviewed emails of BB team re insurer demand letters (.2); reviewed research email of K. Sticklen re insurer duty to settle issues (.2); participate in update call with J.

6.30

\$6,142.50

Bair re insurance strategy post-motion to dismiss hearing (.2); participate in call with state court counsel re same (.2); participate in Committee meeting for insurance purposes re motion to dismiss hearing outcome and next-steps (.8);

7/12/2023 Jesse Bair

0.50

\$312.50

Analysis re potential insurance demand letters (.3); provide instructions to team re preparing LMI and Interstate demand letters (.2);

7/12/2023 Jesse Bair

0.30

\$187.50

Participate in conference with T. Burns re the Diocese's potential Arrowood proposal and next-steps re overall insurance strategy (.3);

7/12/2023 Jesse Bair

0.20

\$125.00

Review the Court's order sustaining the Diocese's 12th omnibus claim objection (.2);

7/12/2023 Brian Cawley

Review J. Bair email regarding demand letter assignment and related materials (.2);

0.20

\$84.00

7/12/2023 Timothy Burns

Formulate insurance strategy in light of motion to dismiss hearing (.8); participate in conference with J. Bair re the Diocese's potential Arrowood proposal and next-steps re overall insurance strategy (.3); participate in call with state court counsel re same (.1); participate in call with the mediator re aspects of same (.2); participate in call with state court counsel re outcome of call with mediator (.2); participate in call with I. Nasatir re PSZJ discussion with Jones Day re insurance issues (.3); participate in supplemental call with state court counsel re insurance strategy (.1);

2.00

\$1,950.00

7/13/2023 Jesse Bair

Participate in call with I. Nasatir re the Diocese's potential Arrowood proposal (.1);

0.10

\$62.50

7/13/2023 Jesse Bair

Review Arrowood's letter to the Court re status of Cosgrove subpoena issues (.1);

0.10

\$62.50

7/13/2023 Nathan Kuenzi

Begin drafting LMI and Interstate demand letters (3.0);

3.00

\$1,260.00

7/13/2023 Jesse Bair

Review and edit draft LMI/Interstate demand letter (.1); correspondence with B. Cawley re same and potential edits (.1);

0.20

\$125.00

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Pg 51 of 97	Main Document
7/13/2023	Jesse Bair	Review order sustaining the Diocese's 11th omnibus claims objection (.2);	0.20	\$125.00
7/13/2023	Brian Cawley	Draft email to A. Turgeon explaining factual information relevant to LMI and Interstate demands (.3); analyze factual information identified by A. Turgeon re same (.3);	0.60	\$252.00
7/13/2023	Jesse Bair	Review monthly PSIP information provided by the Diocese (.1);	0.10	\$62.50
7/13/2023	Brian Cawley	Begin drafting LMI and Interstate demand letters (1.9); implement J. Bair's preliminary suggestions to same (.2);	2.10	\$882.00
7/13/2023	Alyssa Turgeon	Identify factual information relevant to LMI and Interstate demand letters (.1);	1.00	\$360.00
7/14/2023	Brian Cawley	Finish drafting LMI and Interstate demands letters (3.3);	3.30	\$1,386.00
7/14/2023	Jesse Bair	Review agenda for upcoming July 18 court hearing (.1);	0.10	\$62.50
7/14/2023	Jesse Bair	Participate in additional call with T. Burns re upcoming meeting with Reed Smith to discuss case insurance issues (.1);	0.10	\$62.50
7/14/2023	Nathan Kuenzi	Draft LMI and Interstate demand letters (3.0);	3.00	\$1,260.00
7/14/2023	Jesse Bair	Participate in conference with T. Burns re post-MTD hearing insurance strategy (.2);	0.20	\$125.00
7/14/2023	Jesse Bair	Participate in call with J. Stang and T. Burns re case insurance strategy and next-steps re same (.5);	0.50	\$312.50
7/14/2023	Leakhena Au	Draft LMI and Interstate demand letters (3.6);	3.60	\$1,512.00
7/14/2023	Timothy Burns	Participate in conference with J. Bair re post-motion to dismiss insurance strategy (.2); participate in call with J. Stang and J. Bair re same (.5); leave voice-message for Reed Smith re meeting to discuss case insurance issues (.1); participate in additional call with J. Bair re upcoming meeting with Reed Smith to discuss case insurance issues (.1);	0.90	\$877.50
7/17/2023	Brian Cawley	Participate in conference with J. Bair re insurance case developments (.1);	0.10	\$42.00
7/17/2023	Jesse Bair	Analysis re potential Arrowood insurance demands (.2); correspondence with B. Michael re same (.1); participate in conference with B. Cawley re insurance case developments (.1);	0.40	\$250.00

7/18/2023 Timothy Burns

Pg 52 of 97

	Participate in conference with J. Bair re objection hearing and motion to dismiss ruling (.2); review correspondence with PSZJ re same (.2); review motion to dismiss order (.2); participate in portion of state court counsel meeting for insurance purposes (.3); participate in portion of Committee meeting for insurance purposes (.5); participate in conference with J. Bair re outcome of Committee meeting (.2); review order on 12th omnibus Claims Objection (.4); reviewed order on 11th omnibus Claims Objection (.4); review removal extension order (.1); review confidentiality order addendum in insurance Arrowood adversary proceeding (.1) review Arrowood's letter to the court re same (.1); reviewed the Diocese's reply in support of its 12th (.1); 13th (.3), 14th (.1) and 15th (.2) omnibus claims objection; participate in conference with J. Bair re upcoming insurance meeting with Reed Smith (.1);	3.50	\$3,412.50
7/18/2023 Jesse Bair	Participate in conference with T. Burns re upcoming insurance meeting with Reed Smith (.1);	0.10	\$62.50
7/18/2023 Jesse Bair	Participate in state court counsel meeting for insurance purposes re motion to dismiss outcome and next-steps (.5);	0.50	\$312.50
7/18/2023 Jesse Bair	Participate in Committee meeting for insurance purposes re motion to dismiss outcome and next steps (.9); participate in post-meeting conference with T. Burns re outcome of meeting (.2);	1.10	\$687.50
7/18/2023 Jesse Bair	Review Order denying without prejudice the Committee's motion to dismiss (.2);	0.20	\$125.00
7/18/2023 Jesse Bair	Attend claim objection hearing and status conference for insurance purposes (1.6); participate in post-hearing call with T. Burns re hearing outcome and motion to dismiss oral ruling (.2);	1.80	\$1,125.00
7/19/2023 Jesse Bair	Prepare for insurance meeting with Reed Smith (.6); participate in conference with T. Burns re preparations and strategy for Reed Smith insurance meeting (.7);	1.30	\$812.50
7/19/2023 Brian Cawley	Analyze issues in connection with Committee derivative standing to bring Section 349 claim (.2);	0.20	\$84.00
7/19/2023 Jesse Bair	Return travel to Madison from New York from Reed Smith insurance meeting [billed at 1/2 travel rate] (7.0);	7.00	\$2,187.50

7/19/2023 Jesse Bair

	Pg 53 of 97			
7/19/2023 Jesse Bair	Participate in insurance meeting with Reed Smith and T. Burns (1.0); participate in follow-up meeting with A. Kramer re insurance mediation issues (.3); analyze case mediation notes in connection with same (.1);	1.40	\$875.00	
7/19/2023 Jesse Bair	Travel to New York from Madison for insurance meeting with Reed Smith [billed at 1/2 travel rate] (4.9);	4.90	\$1,531.25	
7/19/2023 Timothy Burns	Return travel from New York to Madison from Reed Smith insurance meeting [billed at 1/2 travel rate] (4.9);	4.90	\$2,388.75	
7/19/2023 Jesse Bair	Correspondence with J. Stang re Committee derivative standing re Section 349 claim against Arrowood (.2);	0.20	\$125.00	
7/19/2023 Timothy Burns	Travel to New York from Madison for Reed Smith insurance meeting [billed at 1/2 travel rate] (5.1);	5.10	\$2,486.25	
7/19/2023 Timothy Burns	Prepare for meeting with Diocese re case insurance issues (2.8); conference with J. Bair re preparations and strategy for Reed Smith insurance meeting (.7); participate in insurance meeting with Reed Smith (1.0); participate in post-meeting conference with J. Bair re strategy (.2); participate in call with state court counsel re same (.3); review correspondence with PSZJ and BB re Arrowood strategy (.2); analysis re derivative standing issues in connection with same (.2);	5.40	\$5,265.00	
7/19/2023 Jesse Bair	Participate in conference with T. Burns re outcome of insurance meeting with Reed Smith and potential next steps (.2); participate in call with state court counsel and T. Burns re same (.3);	0.50	\$312.50	
7/20/2023 Jesse Bair	Prepare with T. Burns for call with co-mediators re case insurance issues (.2);	0.20	\$125.00	

7/20/2023 Timothy Burns

Pg 54 of 97

	Prepared insurance strategy PowerPoint concerning recent case developments (1.7); correspondence with J. Bair re same (.1); conference with J. Bair re same and potential edits (.5); correspondence with J. Stang and state court counsel re insurance strategy (.2); participate in call with state court counsel re insurance strategy meeting (.1); consideration of Section 349 strategy (.3); participate in conference with J. Bair re same (.3); review legal research re and considered irreparable harm issues (.7); reviewed injury-in-fact and irreparable harm case law (.4); exchanged correspondence with the mediator re case mediation issues (.1); met with J. Bair re same (.1); reviewed settlement progression chart (.1); prepare for meeting with PSZJ re case insurance initiatives (.3); participate in meeting with PSZJ re same (.3); met with J. Bair re preparations for call with co-mediators (.2); prepare for call with co-mediators (.4); participate in call with co-mediators (.2); review and revise draft letters to the insurers and diocese re non-consensual insurance settlements and negotiations without Committee involvement (1.4); correspondence with state court counsel and J. Stang re same (.1);	7.50	\$7,312.50
7/20/2023 Leakhena Au	Correspond with T. Burns re draft letters to the insurers and the Diocese re non-consensual insurance settlements (.1);	0.10	\$42.00
7/20/2023 Jesse Bair	Prepare for meeting with PSZJ team re going-forward insurance strategy and related action items (.1); participate in insurance meeting with PSZJ team and T. Burns re same (.3);	0.40	\$250.00
7/20/2023 Jesse Bair	Review and edit draft insurance strategy PowerPoint concerning recent case developments (.2); participate in conference with T. Burns re same and going-forward insurance strategy (.5);	0.70	\$437.50
7/20/2023 Leakhena Au	Research standard for injunction under New York GBL Section 349 (1.6);	1.60	\$672.00
7/20/2023 Jesse Bair	Participate in conference with T. Burns re potential Section 349 strategy re the insurers (.3);	0.30	\$187.50
7/20/2023 Jesse Bair	Review North Carolina appellate decision affirming dismissal of the Diocese of Brooklyn's unfair business practices lawsuit against Arrowood's parent company and directors and officers (.1);	0.10	\$62.50
7/20/2023 Jesse Bair	Correspondence with the mediators re current status of insurer offers and responses (.1);	0.10	\$62.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Main Document
7/20/2023 Jesse Bair	Pg. 55 of 97 Provide instructions to L. Au re research needed re preliminary injunction standard under Section 349 claim (.1); review L. Au research results re same (.1);	0.20	\$125.00
7/20/2023 Jesse Bair	Review correspondence with T. Burns and state court counsel re draft insurance letters to the Diocese and insurers re non-consensual settlements (.1);	0.10	\$62.50
7/20/2023 Jesse Bair	Draft revised summary re insurer mediation status and current offers / responses (.1); conference with T. Burns re same (.1);	0.20	\$125.00
7/21/2023 Jesse Bair	Review Committee insurance letters to the carriers (.2);	0.20	\$125.00
7/21/2023 Jesse Bair	Correspondence with T. Burns re outcome of state court counsel meeting re case insurance strategy (.1);	0.10	\$62.50
7/21/2023 Leakhena Au	Revise letters to the insurers and the Diocese re non-consensual insurance settlements based on additional feedback from T. Burns (3.3);	3.30	\$1,386.00
7/21/2023 Jesse Bair	Correspondence with T. Burns re insurance letters to the Diocese and the insurers (.1);	0.10	\$62.50
7/21/2023 Karen Dempski	Finalize and serve Committee insurance letters on the Diocese and the insurers (.5);	0.50	\$180.00
7/21/2023 Timothy Burns	Prepared for insurance strategy presentation to state court counsel (2.7); participate in call with J. Stang re state court counsel meeting and insurance strategy (.6); participate in weekly state court counsel meeting and presented re insurance strategy (1.1); reviewed and revised letters to the Diocese and all insurers re non-consensual insurance settlements and related negotiations without Committee involvement (3.6); correspondence with state court counsel re same (.1);	8.10	\$7,897.50
7/21/2023 Brian Cawley	Analysis re recent developments in the Arrowood mandamus action (.3); correspondence with T. Burns and J. Bair re same (.2);	0.50	\$210.00
7/21/2023 Jesse Bair	Review Committee insurance letter to the Diocese (.1);	0.10	\$62.50
7/22/2023 Jesse Bair	Review and respond to correspondence with T. Burns and J. Stang re insurance letters to the Diocese and insurers (.2);	0.20	\$125.00
7/22/2023 Jesse Bair	Preliminary review re B. Cawley Interstate coverage letter analysis (.1);	0.10	\$62.50
7/22/2023 Timothy Burns	Analysis regarding insurance mediation issues raised by J. Stang (.8); respond to correspondence with J. Stang re same (.4);	1.20	\$1,170.00
7/22/2023 Jesse Bair	Review Order sustaining the Diocese's 15th omnibus claims objection (.1);	0.10	\$62.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Main Document
7/23/2023 Jesse Bair		Pg 56 of 97 Review notice of omnibus hearing re interim Committee professional fee applications (.1);	0.10 \$62.50
7/24/2023 Nathan Kuenzi		Review and analyze Arrowood materials, including past filings, recent Diocese of Brooklyn complaint seeking to place Arrowood into liquidation, and information regarding Arrowood claims monitor, and begin drafting Rule 2004 discovery topics against Arrowood (5.3);	5.30 \$2,226.00
7/24/2023 Nathan Kuenzi		Participate in conference with J. Bair re preparing Rule 2004 discovery against Arrowood (.2); review J. Bair correspondence re additional instructions re same (.1);	0.30 \$126.00
7/24/2023 Jesse Bair		Review Committee letter to potential 3rd party releasees re financial disclosures (.1); review Committee letter to the parishes re same (.1);	0.20 \$125.00
7/24/2023 Jesse Bair		Participate in conference with T. Burns re PI issues re non-consensual Diocese-insurer settlement (.2);	0.20 \$125.00
7/24/2023 Brian Cawley		Participate in BB team meeting regarding case status and projects (.1);	0.10 \$42.00
7/24/2023 Jesse Bair		Review Committee letter to the Diocese re continued plan negotiations and needed 3rd party financial information (.1);	0.10 \$62.50
7/24/2023 Brenda Horn-Edwards		Draft BB monthly fee statement (.6); generate and edit Exhibit A to same (.1); correspond with J. Bair re same (.1);	0.80 \$288.00
7/24/2023 Jesse Bair		Participate in BB team meeting re case status and related insurance assignments (.1);	0.10 \$62.50
7/24/2023 Nathan Kuenzi		Participate in BB team meeting regarding case status and projects (.1);	0.10 \$42.00
7/24/2023 Timothy Burns		Analysis of PI issues re Diocese-insurer settlement (.8); met with J. Bair re same (.2); participate in call with state court counsel and J. Bair re insurance strategy (.3); participate in BB team meeting re case status and assignments (.1); reviewed correspondence from the Committee to the Diocese re disclosures, mediation, and plan negotiation (.2); review Committee correspondence to the parishes re same (.1);	1.70 \$1,657.50
7/24/2023 Leakhena Au		Participate in BB team meeting regarding case status and projects (.1);	0.10 \$42.00
7/24/2023 Jesse Bair		Provide instructions to N. Kuenzi re preparing Rule 2004 discovery against Arrowood (.2); answer N. Kuenzi follow-up questions re same (.1);	0.30 \$187.50
7/24/2023 Jesse Bair		Participate in call with state court counsel and T. Burns re case insurance strategy (.3);	0.30 \$187.50

7/25/2023 Timothy Burns

Pg 57 of 97

	Review draft 2004 examination of Arrowood (.8); reviewed correspondence from K. Dine re upcoming Committee meeting (.1); participate in weekly Committee meeting for insurance purposes (1.0); review information re recent Diocesan insurance activities (.2);	2.10	\$2,047.50
7/25/2023 Jesse Bair	Review Diocese correspondence to state court counsel re specific claims settlement proposal (.1);	0.10	\$62.50
7/25/2023 Jesse Bair	Review the Diocese's response to the Committee's letter re 3rd party financial disclosures (.1); review Committee reply to same (.1);	0.20	\$125.00
7/25/2023 Nathan Kuenzi	Finish drafting Arrowood 2004 discovery requests (6.3);	6.30	\$2,646.00
7/25/2023 Jesse Bair	Review correspondence with I. Nasatir re recent Diocesan insurance activities (.1); participate in conference with N. Kuenzi re Arrowood 2004 discovery requests (.1);	0.20	\$125.00
7/25/2023 Jesse Bair	Participate in Committee meeting for insurance purposes re case status and strategy (1.0);	1.00	\$625.00
7/25/2023 Nathan Kuenzi	Participate in conference with J. Bair re Arrowood 2004 discovery requests (.1);	0.10	\$42.00
7/26/2023 Jesse Bair	Draft correspondence to state court counsel re Interstate negotiation status and potential counter (.2);	0.20	\$125.00
7/26/2023 Jesse Bair	Correspondence with the mediators re Committee insurance negotiation status and counters (.2);	0.20	\$125.00
7/26/2023 Jesse Bair	Prepare for call with PSZJ re case insurance strategy and next-steps (.1); participate in call with PSZJ and T. Burns re same (.5);	0.60	\$375.00
7/26/2023 Jesse Bair	Review LMI's response to the Committee's letter re non-consensual insurance settlements (.1); review the Diocese's response to the Committee's letter re same (.1); review correspondence with PSZJ re same (.1); consideration of potential responses to the Diocese and LMI (.1);	0.40	\$250.00
7/27/2023 Jesse Bair	Participate in conference with T. Burns re next steps re adversary complaint and PI motion (.2);	0.20	\$125.00
7/27/2023 Jesse Bair	Review correspondence with J. Stang and T. Burns re case insurance strategy (.1); participate in conference with T. Burns re same (.2);	0.30	\$187.50

7/27/2023 Leakhena Au

Pg 58 of 97

	Participate in conference with T. Burns re derivative standing issues in connection with Section 349 complaint (.2); research standing requirements, especially demand excused, for derivative complaints (3.5); begin drafting Section 349 derivative complaint against LMI and Interstate (3.3);	7.00	\$2,940.00
7/27/2023 Jesse Bair	Review correspondence from Judge Cave re mediation issues (.1);	0.10	\$62.50
7/27/2023 Jesse Bair	Review draft section 2004 requests to Arrowood (.2); conference with T. Burns re same (.1); review J. Stang and T. Burns correspondence re same (.1);	0.40	\$250.00
7/27/2023 Nathan Kuenzi	Review and edit Arrowood 2004 requests based on partner feedback (.5);	0.50	\$210.00
7/27/2023 Jesse Bair	Review Lexington response to UCC re nonconsensual insurance settlements (.1);	0.10	\$62.50
7/27/2023 Nathan Kuenzi	Correspond with PSZJ team re draft Arrowood 2004 discovery requests (.2);	0.20	\$84.00
7/27/2023 Katie Sticklen	Supplemental legal research re insurer conduct giving rise to Section 349 violations (2.7);	2.70	\$1,020.60
7/27/2023 Jesse Bair	Review correspondence with K. Dine and T. Burns re upcoming mediation sessions (.1);	0.10	\$62.50
7/27/2023 Timothy Burns	Met with J. Bair re next steps re adversary complaint and PI motion (.2); met with L. Au re assignments re same (.2); participate in call with committee professionals re insurance strategy (.3); reviewed email from PSZJ re same (.1); met with J. Bair re same (.2); participate in call with state court counsel re same (.2); reviewed and responded to correspondence from J. Stang re same (.2); reviewed and responded to correspondence from K. Dine re upcoming mediation sessions (.2); reviewed and revised Arrowood discovery requests (1.5); provides edits to N. Kuenzi (.1); met with J. Bair re same (.1);	3.30	\$3,217.50
7/28/2023 Timothy Burns	Reviewed and revised response to Diocese re insurer-Diocesan only settlement (.4); prepare for weekly state court counsel meeting (.8); participate in weekly state court counsel meeting for insurance purposes (1.4); participate in post call with J. Bair re next steps (.1); reviewed and revised draft motion to lift the stay to send insurance demand letters (.9);	3.60	\$3,510.00

7/28/2023 Jesse Bair

Pg. 59 of 97

7/28/2023 Leakhena Au

Participate in state court counsel meeting for insurance purposes re litigation and mediation strategy (1.4); participate in post-meeting conference with T. Burns re next-steps (.1); participate in conference with L. Au re preparing draft Section 349 complaint against LMI and Interstate (.2);

1.70 \$1,062.50

7/28/2023 Jesse Bair

Participate in conference with J. Bair re preparing draft Section 349 complaint against LMI and Interstate (.2); continue drafting Section 349 complaint against LMI and Interstate (7.2);

7.40 \$3,108.00

7/29/2023 Timothy Burns

Draft Committee reply to the Debtor's response to Committee letter re non-consensual insurance settlements (1.3); review J. Stang's suggested edits to same (.1); revise and finalize reply letter to the Diocese (.2);

1.60 \$1,000.00

7/29/2023 Jesse Bair

Continue reviewing and revising draft motion to lift the stay to send insurance demand letters (1.9);

1.90 \$1,852.50

7/29/2023 Jesse Bair

Review I. Nasatir correspondence re Arrowood 2004 requests issues (.1);

0.10 \$62.50

7/29/2023 Jesse Bair

Correspondence with J. Stang re Interstate counter (.1); correspondence with state court counsel re same (.1);

0.20 \$125.00

7/30/2023 Jesse Bair

Additional correspondence with state court counsel re Interstate counter and overall insurance negotiations (.1);

0.10 \$62.50

7/30/2023 Timothy Burns

Reviewed correspondence with state court counsel re mediation offers (.2);

0.20 \$195.00

7/31/2023 Jesse Bair

Correspondence with the mediators re Committee Interstate counter (.1);

0.10 \$62.50

7/31/2023 Jesse Bair

Prepare for call with state court counsel re Interstate counter and overall insurance negotiations (.1); participate in call with state court counsel re same (.2);

0.30 \$187.50

7/31/2023 Timothy Burns

Participate in call with the co-mediators, PSZJ, and J. Bair re case mediation issues (1.0); participate in post-meeting call with PSZJ and J. Bair re outcome of same and next-steps (.2); participate in call with J. Bair and state court counsel re insurance demands (.5);

1.70 \$1,657.50

7/31/2023 Jesse Bair

Participate in call with state court counsel and T. Burns re insurance strategy and potential insurance demand letters (.5);

0.50 \$312.50

7/31/2023 Brian Cawley

Analysis re recent developments in the Arrowood Delaware mandamus action (.4); correspondence with T. Burns and J. Bair re same (.2);

0.60 \$252.00

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Main Document
7/31/2023 Jesse Bair		Pg 60 of 97 Review Evanston's response to the Committee re non-consensual insurance settlement issues (.1); review Interstate response to the Committee re same (.1);	0.20 \$125.00
7/31/2023 Jesse Bair		Prepare for meeting with the mediators re ongoing case negotiations (.2); participate in meeting with the mediators, PSZJ, and T. Burns re same (1.0); participate in post-meeting call with PSZJ and T. Burns re outcome of same and next-steps (.2);	1.40 \$875.00
7/31/2023 Jesse Bair		Review mediator correspondence re August 4 mediations session (.1);	0.10 \$62.50
<b>Total Hours and Fees</b>			<b>196.00 \$125,017.55</b>

### EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
7/1/2023	Second Quarter 2023 PACER (Public Access to Court Electronic Records)	\$76.50
7/19/2023	Travel meal, T. Burns	\$7.89
7/19/2023	United Airlines, T. Burns (July 19 MSN-EWR)	\$877.80
7/19/2023	Delta Airlines Onboard WiFi, J. Bair	\$15.95
7/19/2023	United Airlines Inflight WiFi, T. Burns (MSN-EWR)	\$8.00
7/19/2023	United Airlines Inflight WiFi, T. Burns (EWR-MSN)	\$8.00
7/19/2023	Uber, J. Bair (meeting to airport)	\$91.71
7/19/2023	Airport parking, J. Bair	\$10.00
7/19/2023	Delta Airlines, J. Bair (July 19, MSN-LGA)	\$1,227.20
7/19/2023	Travel meal, J. Bair	\$15.27
7/19/2023	Taxi, J. Bair (airport to meeting)	\$66.35
<b>Total Expenses</b>		<b>\$2,404.67</b>

### Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alyssa Turgeon	1.00	\$360.00	\$360.00
Brenda Horn-Edwards	1.00	\$360.00	\$360.00
Brian Cawley	9.30	\$420.00	\$3,906.00
Jesse Bair	11.90	\$312.50	\$3,718.75
Jesse Bair	43.60	\$625.00	\$27,250.00
Karen Dempski	0.50	\$360.00	\$180.00
Katie Sticklen	8.10	\$378.00	\$3,061.80
Leakhena Au	28.80	\$420.00	\$12,096.00
Nathan Kuenzi	19.00	\$420.00	\$7,980.00
Timothy Burns	10.00	\$487.50	\$4,875.00

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Timothy Burns	62.80	\$975.00	\$61,230.00

**Total Due This Invoice: \$127,422.22**

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
[www.BurnsBair.com](http://www.BurnsBair.com)

**The Official Committee of Unsecured Creditors  
of The Roman Catholic Diocese of Rockville  
Centre**

**Issue Date :** 9/28/2023

**Bill # :** 01221

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

<b>Date</b>	<b>Timekeeper</b>	<b>Narrative</b>	<b>Hours</b>	<b>Amount</b>
8/1/2023	Jesse Bair	Participate in Committee meeting for insurance purposes re case mediation and insurance strategy and next-steps (1.5);	1.50	\$937.50
8/1/2023	Brian Cawley	Discuss motion for relief from stay with T. Burns (.1); revise and edit motion to implement partner feedback (3.9);	4.00	\$1,680.00
8/1/2023	Jesse Bair	Review agenda for upcoming Committee meeting (.1);	0.10	\$62.50
8/1/2023	Jesse Bair	Participate in conference with T. Burns re motion to lift stay to send insurance demands (.1);	0.10	\$62.50
8/1/2023	Nathan Kuenzi	Review suggested edits to Arrowood 2004 topics from I. Nasatir (.4);	0.40	\$168.00
8/1/2023	Timothy Burns	Participate in call with J. Stang re Committee meeting agenda and insurance presentation (.3); conference with J. Bair re motion to lift stay to send insurance demands (.1); review and revise motion for relief from stay to send insurance demands (1.8); review agenda for Committee meeting (.1); participate in Committee meeting for insurance purposes re case insurance strategy (1.5);	3.80	\$3,705.00
8/1/2023	Jesse Bair	Review correspondence with K. Dine and the mediators re August mediation session (.1); review Order scheduling mediation (.1);	0.20	\$125.00
8/2/2023	Brian Cawley	Conference with T. Burns and B. J. Bair re motion to lift stay briefing (.2); discuss details of stay and research project with K. Sticklen (.5);	0.70	\$294.00
8/2/2023	Jesse Bair	Review and consider notice of reassignment of the LMI district court action to Judge Subramanian (.1);	0.10	\$62.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Main Document
8/2/2023	Jesse Bair	Pg 63 of 97 Review correspondence with K. Dine and the mediators re August 25 mediation session (.1);	0.10      \$62.50
8/2/2023	Katie Sticklen	Discuss research project re case law on topic of automatic stay and demand letter correlation to debtor with B. Cawley (.5); research case law regarding automatic stay and demand letter correlation to debtor and if a demand letter can be sent to debtor notwithstanding automatic stay (3.7);	4.20      \$1,587.60
8/2/2023	Jesse Bair	Conference with T. Burns and B. Cawley re motion to lift stay briefing (.2)	0.20      \$125.00
8/2/2023	Brian Cawley	Continue drafting motion for relief from stay and implementing partner feedback (5.5);	5.50      \$2,310.00
8/2/2023	Timothy Burns	Review and revise latest draft of motion for relief from stay re insurance demands (1.1); conference with B. Cawley re revisions to same (.3); review and respond to correspondence from the mediators and K. Dine re mediation logistics (.1); conference with J. Bair and B. Cawley re motion to lift stay briefing (.2); review and respond to correspondence from K. Dine re Arrowood (.1); brief review of Arrowood 2004 motion draft (.1); review the Debtor's letter to the district court re removal issues (.2);	2.10      \$2,047.50
8/2/2023	Brian Cawley	Participate in supplemental conference with T. Burns re additional edits and comments on latest version of motion for relief from stay draft (.3);	0.30      \$126.00
8/3/2023	Jesse Bair	Correspondence with I. Nasatir re 2022 Arrowood supervision order (.1);	0.10      \$62.50
8/3/2023	Timothy Burns	Review and revise adversary complaint re potential insurer-Diocese only settlement and Section 349 claim (1.2); conference with N. Kuenzi re revisions to same (.3); review correspondence between J. Bair and BB team re insurance demands (.2); review correspondence from the mediators re upcoming mediations (.1);	1.80      \$1,755.00
8/3/2023	Katie Sticklen	Continue researching case law regarding automatic stay and demand letter correlation to debtor and if a demand letter can be sent to debtor notwithstanding the automatic stay (2.0); conference with B. Cawley re Arrowood demand letter project (.4); analyze POC information in connection with drafting Arrowood insurance demand letters (1.6);	4.00      \$1,512.00
8/3/2023	Jesse Bair	Review correspondence from the mediators re upcoming mediation session (.1);	0.10      \$62.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Main Document
8/3/2023	Alyssa Turgeon	Pg 64 of 97 Conference with B. Cawley re Arrowood demand letter assignment (.2); analyze Arrowood policy information in connection with drafting Arrowood insurance demand letters (1.0);	1.20 \$432.00
8/3/2023	Jesse Bair	Provide instructions to B. Cawley re preparing Arrowood insurance demands (.2); answer follow-up questions re same (.1);	0.30 \$187.50
8/3/2023	Nathan Kuenzi	Begin revising draft Section 349 complaint based on partner suggestions (1.6);	1.60 \$672.00
8/3/2023	Jesse Bair	Correspondence with K. Dine re Committee insurance strategy PowerPoint (.1);	0.10 \$62.50
8/3/2023	Nathan Kuenzi	Prepare for conference with T. Burns re Section 349 complaint (.1); participate in conference with T. Burns re same and suggested revisions (.3)	0.40 \$168.00
8/3/2023	Brian Cawley	Draft new insurance demand letter language (.2); discuss demand letter project with K. Sticklen (.4); create spreadsheet of relevant insurance demand letter information (.5); discuss demand letter assignment with A. Turgeon (.2); draft Arrowood insurance demand letters (1.3); revise LMI/Allianz insurance demand letters (.5);	3.10 \$1,302.00
8/3/2023	Brian Cawley	Continue drafting revised version of motion for relief from stay to send insurance demands (3.8); research duty to settle and effect of demands in connection with same (2.1);	5.90 \$2,478.00
8/4/2023	Timothy Burns	Review correspondence from co-mediators and PSZJ re mediation (.1);	0.10 \$97.50
8/4/2023	Jesse Bair	Review draft correspondence to the Diocese re potential non-consensual insurance settlements (.1); correspondence with N. Kuenzi re suggested edits to same (.1);	0.20 \$125.00
8/4/2023	Nathan Kuenzi	Continue drafting revised section 349 adversary complaint (4.5);	4.50 \$1,890.00
8/4/2023	Brian Cawley	Continue drafting Arrowood demand letters (3.1); discuss demand letter project with K. Sticklen (.2);	3.30 \$1,386.00
8/4/2023	Nathan Kuenzi	Review communications from J. Bair regarding letter to the Diocese re non-consensual insurance settlements and potential 349 complaint (.1); draft revisions to letter based on same (.3);	0.40 \$168.00
8/4/2023	Katie Sticklen	Continue researching case law regarding automatic stay and demand letter correlation to debtor and if a demand letter can be sent to debtor notwithstanding the automatic stay (4.0); conference with B. Cawley re Arrowood demand letter project (.2); continue analyzing POC information in connection with drafting Arrowood insurance demand letters (3.3);	7.50 \$2,835.00

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Pg 65 of 97	Main Document
8/4/2023	Jesse Bair	Review correspondence from the mediators re insurance counters (.1);	0.10	\$62.50
8/4/2023	Nathan Kuenzi	Draft letter to the Diocese re non-consensual insurance settlement issues and potential Section 349 complaint re same (1.8);	1.80	\$756.00
8/4/2023	Jesse Bair	Review monthly Diocese PSIP information (.1);	0.10	\$62.50
8/5/2023	Nathan Kuenzi	Review communications from J. Bair regarding draft derivative standing letter to the Diocese (.2); revise letter based on partner feedback (1.6);	1.80	\$756.00
8/5/2023	Nathan Kuenzi	Review communications from J. Bair regarding draft Section 349 complaint (.1); draft revised version of same to incorporate partner edits (1.5);	1.60	\$672.00
8/5/2023	Jesse Bair	Respond to correspondence with K. Dine and J. Stang re Arrowood 2004 exam issues (.1); participate in call with T. Burns re same (.1);	0.20	\$125.00
8/5/2023	Jesse Bair	Respond to additional correspondence with N. Kuenzi re response letter to the Diocese re potential non-consensual insurance settlements (.1);	0.10	\$62.50
8/5/2023	Jesse Bair	Participate in call with T. Burns re derivative demand letter to the Diocese re Section 349 claim re non-consensual insurance settlements (.1);	0.10	\$62.50
8/5/2023	Timothy Burns	Review and revise draft Section 349 complaint re diocesan-insurer settlement (1.4);	1.40	\$1,365.00
8/6/2023	Brian Cawley	Continue drafting Arrowood demands (2.4);	2.40	\$1,008.00
8/6/2023	Timothy Burns	Review and revise derivative demand letter (.6); review and revise Arrowood 2004 discovery motion and topics (.8);	1.40	\$1,365.00
8/6/2023	Brian Cawley	Draft Burns declaration in support of motion for relief from stay (1.3); draft notice and proposed Order for motion for relief from stay (.6);	1.90	\$798.00
8/7/2023	Jesse Bair	Correspondence with PSZJ team re current draft of Rule 2004 requests to Arrowood (.1);	0.10	\$62.50
8/7/2023	Jesse Bair	Begin reviewing and editing draft motion for partial lift of the stay to send insurance demand letters (2.3); case law research in connection with same (.1); participate in call with B. Cawley re additional edits needed to same (.1); correspondence with B. Cawley re exhibits needed in connection with same (.1);	2.60	\$1,625.00
8/7/2023	Jesse Bair	Begin reviewing and editing draft Section 349 complaint against LMI and Interstate (.3);	0.30	\$187.50
8/7/2023	Brian Cawley	Correspond with J. Bair and T. Burns regarding motion for relief from stay (.5);	0.50	\$210.00
8/7/2023	Jesse Bair	Review recent LMI counter (.1);	0.10	\$62.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Pg 66 of 97	Main Document
8/7/2023	Nathan Kuenzi	Draft revisions to Arrowood 2004 discovery requests based on feedback from PSZJ and T. Burns (1.0); case law research in connection with same (.6);	1.60	\$672.00
8/7/2023	Katie Sticklen	Continue drafting Arrowood demand letters (4.5);	4.50	\$1,701.00
8/7/2023	Brian Cawley	Draft and prepare exhibits to accompany motion for relief from stay (2.9);	2.90	\$1,218.00
8/7/2023	Jesse Bair	Review and edit draft Section 349 derivative standing letter to the Diocese (.3);	0.30	\$187.50
8/7/2023	Nathan Kuenzi	Revise and edit draft Section 349 complaint and derivative standing letter to the Diocese (.4);	0.40	\$168.00
8/7/2023	Brian Cawley	Incorporate partner feedback into motion for relief from stay (2.7);	2.70	\$1,134.00
8/7/2023	Nathan Kuenzi	Draft further revised version of draft Section 349 complaint to incorporate partner suggestions (1.3); case law research in connection with same (1.2);	2.50	\$1,050.00
8/7/2023	Jesse Bair	Review correspondence from the mediators re September mediation sessions (.1);	0.10	\$62.50
8/7/2023	Jesse Bair	Begin reviewing and editing draft Arrowood 2004 motion (.2);	0.20	\$125.00
8/8/2023	Timothy Burns	Review correspondence between BB and PSZJ re Section 349 complaint and derivative standing letter (.1);	0.10	\$97.50
8/8/2023	Jesse Bair	Review and edit draft 2004 motion re Arrowood exam (1.0); analyze case law re pending proceeding rule (.2); review and edit draft Order entering same (.1); review and edit draft 2004 exam topics to Arrowood (.4);	1.70	\$1,062.50
8/8/2023	Nathan Kuenzi	Draft revisions to 2004 motion and accompanying documents and send to J. Bair (.8);	0.80	\$336.00
8/8/2023	Brian Cawley	Finalize Arrowood demand letters (1.6);	1.60	\$672.00
8/8/2023	Jesse Bair	Continue reviewing and editing draft Section 349 complaint against LMI and Interstate (1.3); correspondence with PSZJ team re same and demand letter (.1);	1.40	\$875.00
8/8/2023	Jesse Bair	Review and edit revised version of draft motion to lift stay to send insurance demands (.4); correspondence with PSZJ re same (.1);	0.50	\$312.50
8/9/2023	Jesse Bair	Review K. Dine suggested edits to the draft Section 349 complaint against LMI and Interstate (.2);	0.20	\$125.00
8/9/2023	Jesse Bair	Correspondence with B. Cawley re exhibits needed for Burns declaration in support of draft 2004 Arrowood motion and motion to lift partial stay to send insurance demands (.1);	0.10	\$62.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Main Document
8/9/2023	Brian Cawley	Pg 67 of 97 Draft Burns declaration for 2004 motion (1.0); compile and prepare exhibits to Burns declaration for 2004 motion (.9); email J. Bair regarding exhibits (.1);	2.00 \$840.00
8/9/2023	Timothy Burns	Participate in call with state court counsel re Debtor settlement communications (.4); conference with J. Bair re same (.2);	0.60 \$585.00
8/9/2023	Brian Cawley	Correspondence with J. Bair regarding stay motion exhibits (.2);	0.20 \$84.00
8/9/2023	Jesse Bair	Review and edit revised version of draft Rule 2004 motion against Arrowood (.2); conference with T. Burns re debtor settlement communications (.2);	0.40 \$250.00
8/9/2023	Jesse Bair	Review K. Dine suggested edits to the draft 2004 motion against Arrowood (.1);	0.10 \$62.50
8/9/2023	Jesse Bair	Review and incorporate I. Nasatir's suggestions to draft Section 349 complaint against LMI and Interstate (.6);	0.60 \$375.00
8/9/2023	Brian Cawley	Additional edits and revisions to stay motion declaration and accompanying exhibits (.9);	0.90 \$378.00
8/10/2023	Timothy Burns	Met with state court counsel re insurance strategy (.3); met with J. Bair and N. Kuenzi re same and ongoing project (.3); participate in strategy meeting with PSZJ re case developments, insurance strategy, and next-steps (1.1); participate in call with state court counsel re same (.3); correspondence with state court counsel re settlement offers (.3);	2.30 \$2,242.50
8/10/2023	Brian Cawley	Research case law re standing issues in connection with draft motion to lift stay (3.2); answer T. Burns questions re lift stay issues (.5); draft summary of research and send to T. Burns and J. Bair (1.0);	4.70 \$1,974.00
8/10/2023	Jesse Bair	Review J. Stang correspondence re draft 2004 motion and derivative standing issues (.1); review case law re Committee derivative standing (.2);	0.30 \$187.50
8/10/2023	Nathan Kuenzi	Conference with T. Burns and J. Bair re insurance strategy and ongoing projects (.3);	0.30 \$126.00
8/10/2023	Jesse Bair	Participate in team strategy meeting with PSZJ and T. Burns re settlement updates, insurance strategy, and insurance action-items (1.1); conference with T. Burns and N. Kuenzi re insurance strategy and ongoing projects (.3);	1.40 \$875.00
8/11/2023	Jesse Bair	Review joint letter to the Court requesting discovery extensions in the Arrowood district court action and order granting same (.2);	0.20 \$125.00
8/11/2023	Jesse Bair	Review correspondence from the mediators re Evanston response to the Committee's counter (.1);	0.10 \$62.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Pg 68 of 97	Main Document
8/11/2023	Jesse Bair	Participate in state court counsel meeting for insurance purposes re case developments, strategy, and insurance next-steps (1.8);	1.80	\$1,125.00
8/11/2023	Timothy Burns	Participate in state court counsel meeting for insurance purposes re case developments, strategy, and insurance next-steps (1.8); conference with J. Bair re outcome of same, insurance litigation strategy, and related assignments (.2)	2.00	\$1,950.00
8/11/2023	Brian Cawley	Additional case law research re motion for relief from stay issues (.9);	0.90	\$378.00
8/11/2023	Jesse Bair	Participate in conference with T. Burns re next-steps with case insurance strategy and outcome of state court counsel meeting (.2);	0.20	\$125.00
8/11/2023	Jesse Bair	Review district court order granting the survivors' motion to remand (.2); review correspondence with state court counsel and PSZJ re same (.1);	0.30	\$187.50
8/12/2023	Timothy Burns	Review correspondence with state court counsel and PSZJ re remand ruling (.2); review letter and order re extension of discovery in Arrowood action (.2); correspondence with J. Bair re same (.1); review correspondence from mediator re insurer response to counter (.1);	0.60	\$585.00
8/12/2023	Jesse Bair	Correspondence with T. Burns re status of discovery in the Arrowood district court action (.1);	0.10	\$62.50
8/13/2023	Jesse Bair	Correspondence with B. Cawley re state court counsel lift stay motions (.1);	0.10	\$62.50
8/13/2023	Brian Cawley	Analysis regarding insurance demand letters in connection with lift stay motion (1.2);	1.20	\$504.00
8/14/2023	Jesse Bair	Review and edit revised version of draft Section 349 complaint against LMI and Interstate (1.4);	1.40	\$875.00
8/14/2023	Jesse Bair	Review and finalize Section 349 demand letter to the Diocese (.2);	0.20	\$125.00
8/14/2023	Jesse Bair	Review and edit revised version of Arrowood 2004 Motion (1.5); review and edit revised version of Arrowood 2004 deposition topics (.5); revise and edit proposed Order granting Rule 2004 motion (.1);	2.10	\$1,312.50
8/14/2023	Brian Cawley	Additional revisions to Arrowood 2004 motion (.1);	1.00	\$420.00
8/14/2023	Jesse Bair	Listen to voice-message from the mediator re Lexington negotiations (.1);	0.10	\$62.50
8/14/2023	Jesse Bair	Review Reassignment Order in LMI district court action (.1);	0.10	\$62.50
8/14/2023	Jesse Bair	Analyze and incorporate T. Burns' suggested edits to the draft Section 349 complaint against LMI and Interstate and the draft Section 349 demand letter to the Diocese (.4);	0.40	\$250.00

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Main Document
		Pg 69 of 97	
8/14/2023 Jesse Bair		Review correspondence from LMI re supplemental coverage letter document production (.1);	0.10 \$62.50
8/14/2023 Timothy Burns		Review and revise letter to the Diocese and accompanying draft draft 349 Complaint v. LMI and Interstate (1.4); review remand decision (.4);	1.80 \$1,755.00
8/15/2023 Jesse Bair		Review Arrowood's response to the Committee's letter re non-consensual insurance settlement (.1);	0.10 \$62.50
8/15/2023 Jesse Bair		Review correspondence from I. Nasatir re Arrowood and New York Guarantee Fund issues in connection with same (.1);	0.10 \$62.50
8/15/2023 Jesse Bair		Review K. Dine correspondence re Rule 2004 hearing and briefing deadlines (.1);	0.10 \$62.50
8/15/2023 Jesse Bair		Provide instructions to B. Cawley re preparing revised version of demand letter lift stay motion (.3);	0.30 \$187.50
8/15/2023 Jesse Bair		Review K. Dine correspondence with the Committee re case update and recent developments (.1);	0.10 \$62.50
8/15/2023 Timothy Burns		Review email from J. Bair to BB team with attachments re relief from stay joinders (.2);	0.20 \$195.00
8/16/2023 Jesse Bair		Answer B. Cawley question re edits to partial motions to lift stay to send insurance demands (.1);	0.10 \$62.50
8/16/2023 Brian Cawley		Draft revised, individual motions for relief from stay (2.8); draft revised proposed orders granting individualized relief from stay motions (.5);	3.30 \$1,386.00
8/17/2023 Jesse Bair		Review and respond to correspondence from Arrowood re Rule 2004 meet and confer and potential extension (.2); correspondence with K. Dine re same (.1);	0.30 \$187.50
8/17/2023 Jesse Bair		Review the Diocese's response to the Committee derivative demand letter (.1);	0.10 \$62.50

8/17/2023 Timothy Burns

Pg 70 of 97

	Review correspondence re 2004 meet and confer with Arrowood's counsel (.1); conference with J. Bair re same (.1); review order re extension of discovery in LMI action (.1); review correspondence between PSZJ and state court counsel re diocese's request for information re Arrowood issues (.2); review J. Azrack's decision re remand (.1); review discovery extension request letter from diocese and LMI (.1); review correspondence from K. Dine re insurance issues (.1); review correspondence with J. Bair and B. Cawley re implementation of demand aspect of insurance strategy (.2); review motions for relief from stay draft papers (.2); participate in portion of weekly call with PSZJ team for insurance purposes re case strategy and next-steps (.5);	1.70	\$1,657.50
8/17/2023 Jesse Bair	Participate in conference with T. Burns re Arrowood Rule 2004 meet and confer (.1);	0.10	\$62.50
8/17/2023 Jesse Bair	Participate in conference with B. Cawley re preparing initial draft of Committee Section 349 derivative standing motion (.2); correspondence with B. Cawley re same and providing additional instructions (.1);	0.30	\$187.50
8/17/2023 Jesse Bair	Review the Diocese's and the insurers' request for discovery extensions in the LMI and Evanston district court actions (.1); review Orders granting same (.1);	0.20	\$125.00
8/17/2023 Jesse Bair	Participate in portion of weekly call with PSZJ team for insurance purposes re case developments, strategy, and next-steps (.5);	0.50	\$312.50
8/17/2023 Brian Cawley	Discuss motion for derivative standing project with J. Bair (.2); being drafting Committee motion for derivative standing (2.5);	2.70	\$1,134.00
8/18/2023 Timothy Burns	Prepare draft materials for case insurance update (.4);	0.40	\$390.00
8/18/2023 Jesse Bair	Prepare for Rule 2004 meet and confer with Arrowood (.2); participate in Rule 2004 meet and confer with Arrowood (.2);	0.40	\$250.00
8/18/2023 Jesse Bair	Review amended notice of hearing re Arrowood 2004 motion (.1);	0.10	\$62.50
8/18/2023 Brian Cawley	Continue drafting Committee motion for derivative standing (4.7);	4.70	\$1,974.00
8/18/2023 Jesse Bair	Draft email memorandum to state court counsel re case insurance update and next-steps (.5);	0.50	\$312.50
8/20/2023 Jesse Bair	Correspondence with T. Burns re draft Committee derivative standing motion (.1);	0.10	\$62.50
8/20/2023 Timothy Burns	Review update email to state court counsel re insurance initiatives (.2);	0.20	\$195.00

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Pg 71 of 97	Main Document
8/21/2023 Brian Cawley		Implement partner feedback into motion for derivative standing (1.2); proof and cite-check motion (.9); examine policy exhibits and information for accuracy (.6); draft email with revised motion and exhibit (.2);	2.90	\$1,218.00
8/21/2023 Jesse Bair		Review the Dicoese's and LMI's joint letter to Judge Subramanian re case status in the LMI district court action (.1);	0.10	\$62.50
8/21/2023 Jesse Bair		Review T. Burns' suggested edits to the draft Section 349 derivative standing motion (.2); provide instructions to B. Cawley re edits needed to address same (.2);	0.40	\$250.00
8/21/2023 Timothy Burns		Review and revise Committee motion for derivative standing (1.2);	1.20	\$1,170.00
8/22/2023 Jesse Bair		Review I. Nasatir correspondence re recent Diocesan insurance activities (.1);	0.10	\$62.50
8/22/2023 Timothy Burns		Brief review of latest draft of motion for derivative standing to prosecute section 349 claim (.3); review letter from T. Law and C. Sugayan to court in adversary re discovery schedule and related court order (.2);	0.50	\$487.50
8/22/2023 Jesse Bair		Participate in portion of Committee meeting for insurance purposes (.7);	0.70	\$437.50
8/22/2023 Jesse Bair		Revise and edit the Committee's Section 349 derivative standing motion, including incorporating edits received from PSZJ (2.6); correspondence with PSZJ team re same (.1);	2.70	\$1,687.50
8/22/2023 Jesse Bair		Review agenda for Committee meeting (.1);	0.10	\$62.50
8/23/2023 Jesse Bair		Correspondence with B. Michael re potential LMI counter (.1);	0.10	\$62.50
8/23/2023 Jesse Bair		Participate in call with T. Burns re insurance developments and strategy (.1);	0.10	\$62.50
8/23/2023 Jesse Bair		Analysis re the Diocese's request re the Committee's Rule 2004 Exam of Arrowood (.1); correspondence with T. Burns and PSZJ re same (.1);	0.20	\$125.00
8/23/2023 Timothy Burns		Participate in call with J. Bair re insurance developments and strategy (.1); emails with B. Michael and J. Bair re Diocese's request re Arrowood 2004 exam (.2);	0.30	\$292.50
8/24/2023 Jesse Bair		Identify exhibits to the Burns declaration in support of the Committee's derivative standing motion (.2); provide instructions to B. Cawley and N. Kuenzi re preparing Burns Declaration (.1);	0.30	\$187.50
8/24/2023 Jesse Bair		Review correspondence from K. Dine re case developments and August 25 mediation session (.1);	0.10	\$62.50
8/24/2023 Jesse Bair		Correspond with the mediators re the Committee's response to LMI's latest counter (.1);	0.10	\$62.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Main Document
8/24/2023 Jesse Bair	Pg 72 of 97 Participate in portion of weekly strategy meeting with PSZJ team for insurance purposes re case insurance status and strategy (.5);	0.50	\$312.50
8/24/2023 Brian Cawley	Prepare exhibits for derivative standing motion (1.0); draft Burns declaraiton for derivative standing motion (.6); draft proposed order granting derivative standing motion (.6); correspond with J. Bair and N. Kuenzi regarding derivative standing motion (.4);	2.60	\$1,092.00
8/24/2023 Jesse Bair	Review the Debtor's suggested edits to the proposed Order granting the Committee's Arrowood Rule 2004 motion (.1);	0.10	\$62.50
8/24/2023 Jesse Bair	Correspondence with Arrowood re potential compromise of the Committee's Rule 2004 exam (.2);	0.20	\$125.00
8/24/2023 Nathan Kuenzi	Assist with finalizing derivative motion declaration and exhibits (.7);	0.70	\$294.00
8/24/2023 Timothy Burns	Review and respond to email from debtor re Arrowood discovery (.1); review email from B. Michael to state court counsel re demand cases (.1);	0.20	\$195.00
8/24/2023 Jesse Bair	Review and edit the Committee's Section 349 derivative standing motion, including incorporation of suggested edits from I. Nasatir (1.1); review and edit Burns declaration and exhibits re same (.1); review and edit draft proposed Order granting the Committee's derivative standing motion (.1); correspondence with PSZJ re revised version of Committee derivative standing motion (.1);	1.40	\$875.00
8/24/2023 Jesse Bair	Analysis re insurance issues re unstayed state court actions in connection with potential insurance settlement (.3); correspondence with state court counsel re same (.2);	0.50	\$312.50
8/25/2023 Timothy Burns	Participate in full-day mediation session (7.4);	7.40	\$7,215.00
8/25/2023 Jesse Bair	Prepare for mediation session (.1);	0.10	\$62.50
8/25/2023 Nathan Kuenzi	Draft revisions to New York Guarantee Fund memorandum to incorporate additional research in connection with potential Arrowood recovery (1.0);	1.00	\$420.00
8/25/2023 Nathan Kuenzi	Supplemental analysis and research in connection with New York Guarantee Fund issues re potential Arrowood recovery (2.2);	2.20	\$924.00
8/25/2023 Jesse Bair	Participate in full-day Zoom mediation session (7.4);	7.40	\$4,625.00
8/25/2023 Jesse Bair	Additional correspondence with Arrowood re potential resolution of the Committee's Rule 2004 motion (.1);	0.10	\$62.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Main Document
8/26/2023	Nathan Kuenzi	Pg 73 of 97 Review correspondence from T. Burns re Arrowood Guarantee Fund issues (.1); revise research memorandum in connection with same (.2);	0.30      \$126.00
8/26/2023	Jesse Bair	Analysis re status of insurance demand letters and motion to lift stay in order to send same (.3); draft correspondence to BB team re same and providing instructions re additional items needed for completion in order to finalize and file same (.2);	0.50      \$312.50
8/26/2023	Timothy Burns	Email to N. Kuenzi re research assignment re Arrowood (.1);	0.10      \$97.50
8/27/2023	Brenda Horn-Edwards	Draft monthly BB fee statement (.6); generate and edit Exhibit A to same (.1); correspond with J. Bair re same (.1);	0.80      \$288.00
8/27/2023	Brian Cawley	Correspond with J. Bair regarding Burns declaration for derivative standing motion (.2);	0.20      \$84.00
8/28/2023	Brian Cawley	Discuss status of derivative standing and lift stay motions with T. Burns (.3);	0.30      \$126.00
8/28/2023	Brian Cawley	Organize and circulate state court counsel demand letters (.6);	0.60      \$252.00
8/28/2023	Brian Cawley	Correspondence with state court counsel regarding motion to lift stay and related insurance demands (.5);	0.50      \$210.00
8/28/2023	Jesse Bair	Review correspondence from the mediators re LMI's latest mediation counter (.1);	0.10      \$62.50
8/28/2023	Timothy Burns	Reviewed and responded to mediator's email re LMI's counter (.1); met with B. Cawley re ongoing insurance projects (.3); analyze documents relating to the Debtor's proposal to state court counsel re potential settlements (.8);	1.20      \$1,170.00
8/29/2023	Jesse Bair	Review correspondence from the mediators re Allianz counter offer and potential derivative standing motion extension request (.1); review correspondence with T. Burns and PSZJ team re potential response to same (.1); review additional correspondence with T. Burns and the mediators re same (.1);	0.30      \$187.50
8/29/2023	Jesse Bair	Review K. Dine correspondence with the Committee re August 25 mediation outcome and next-steps (.1);	0.10      \$62.50
8/29/2023	Jesse Bair	Review correspondence with K. Dine and B. Michael re Arrowood Rule 2004 reply brief and edits to proposed order granting the Committee's motion (.1);	0.10      \$62.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Main Document
8/29/2023	Timothy Burns	Pg. 74 of 97 Reviewed mediators' recent correspondence re insurance issues (.2) correspondence with committee professionals re same (.2); call with J. Stang re same (.3); prepared response to same (.2); call with state court counsel re same (.2); prepared for state court counsel meeting (.4); participate in state court counsel meeting for insurance purposes (1.2); reviewed and responded to additional correspondence from mediators (.1);	2.80      \$2,730.00
8/29/2023	Jesse Bair	Review draft Order approving 8th interim fee applications (.1);	0.10      \$62.50
8/30/2023	Brian Cawley	Participate in conference with T. Burns and N. Kuenzi re motions for partial summary judgment re consent to settle issue against LMI and Interstate (.3);	0.30      \$126.00
8/30/2023	Brian Cawley	Draft motion for partial summary judgment on consent to settle issue for Interstate (1.6); draft motion for partial summary judgment on consent to settle issue for LMI (1.5); implement T. Burns feedback into motions (.3);	3.40      \$1,428.00
8/30/2023	Nathan Kuenzi	Participate in conference with T. Burns and B. Cawley re motions for partial summary judgment re consent to settle issue against LMI and Interstate (.3);	0.30      \$126.00
8/30/2023	Brian Cawley	Begin analyzing recent 9019 ruling in Camden for potential impact on DRVC case (.3);	0.30      \$126.00
8/30/2023	Timothy Burns	Conference with B. Cawley and N. Kuenzi re motions for partial summary judgment re consent to settle issue against LMI and Interstate (.4); call with state court counsel re same (.2); call with J. Stang re same (.2); reviewed Camden plan confirmation and insurance settlement decisions re insurance issues in DRVC case (1.8); reviewed and revised motions for partial summary judgment against LMI and Interstate re consent to settle issue (2.2); call with state court counsel re same (.2);	5.00      \$4,875.00
8/30/2023	Nathan Kuenzi	Analyze issues pertaining to potential confidentiality and/or privilege arguments that Arrowood may raise in response to 2004 motion (1.5);	1.50      \$630.00
8/30/2023	Jesse Bair	Review correspondence with T. Burns and K. Dine re potential insurance partial summary judgment motions (.1);	0.10      \$62.50
8/30/2023	Jesse Bair	Preliminary analysis re recent confirmation decision from the Diocese of Camden case (.1);	0.10      \$62.50
8/30/2023	Brian Cawley	Draft Committee joinder to individualized motions for relief from stay to send insurance demands (2.2);	2.20      \$924.00

8/31/2023 Brian Cawley

Pg 75 of 97

	Pg 75 of 97			
8/31/2023 Brian Cawley	Conference with T. Burns re motion for relief from stay joinder (.2); participate in strategy meeting with PSZJ team re case insurance strategy, status, and ongoing projects (1.3); follow-up on action items from same (.5);	2.00	\$840.00	
8/31/2023 Jesse Bair	Review Lexington's request for an extension to respond to the Committee's derivative standing motion (.1);	0.10	\$62.50	
8/31/2023 Brian Cawley	Revise individualized lift stay motions (.3);	0.30	\$126.00	
8/31/2023 Timothy Burns	Participate in call with state court counsel re insurance developments (.2); reviewed and revised motion for relief from stay joinder (1.4); met with B. Cawley re same (.2); participate in weekly strategy call with PSZJ team re case insurance strategy, status, and ongoing projects (1.3); review correspondence from K. Dine re adjournment of derivative standing hearing (.1); email to mediators re same (.1); reviewed and responded to email from Lexington's counsel re same (.1); continued analysis re case insurance strategy and next-steps (.6);	4.00	\$3,900.00	
8/31/2023 Jesse Bair	Review Evanston's response to the Committee's Section 3420 notice letter (.1);	0.10	\$62.50	
8/31/2023 Brian Cawley	Continue analyzing Camden 9019 ruling for material pertinent to DRVC case (1.6);	1.60	\$672.00	
8/31/2023 Jesse Bair	Review correspondence with K. Dine and Chambers re the adjournment of the Committee's derivative standing motion (.1); review correspondence with the mediators re same (.1);	0.20	\$125.00	
8/31/2023 Brian Cawley	Revise and edit Committee joinder in support of lift stay motions to incorporate partner edits (.6);	0.60	\$252.00	
8/31/2023 Nathan Kuenzi	Analyze issues relating to deliberative process privilege in connection with Arrowood 2004 motion (2.2);	2.20	\$924.00	

**Total Hours and Fees****207.70 \$118,810.60****Timekeeper Summary**

<b>Name</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
Alyssa Turgeon	1.20	\$360.00	\$432.00
Brenda Horn-Edwards	0.80	\$360.00	\$288.00
Brian Cawley	74.20	\$420.00	\$31,164.00
Jesse Bair	41.80	\$625.00	\$26,125.00
Katie Sticklen	20.20	\$378.00	\$7,635.60
Nathan Kuenzi	26.30	\$420.00	\$11,046.00
Timothy Burns	43.20	\$975.00	\$42,120.00

**Total Due This Invoice: \$118,810.60**

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
[www.BurnsBair.com](http://www.BurnsBair.com)

**The Official Committee of Unsecured Creditors of  
The Roman Catholic Diocese of Rockville Centre**

**Issue Date :** 10/26/2023  
**Bill # :** 01265

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

<b>Date</b>	<b>Timekeeper</b>	<b>Narrative</b>	<b>Hours</b>	<b>Amount</b>
9/1/2023	Brian Cawley	Continue analyzing Camden Plan opinion in connection with DRVC case (1.3); analyze Camden 9019 opinion in connection with DRVC case (1.4);	2.70	\$1,134.00
9/1/2023	Jesse Bair	Conference with T. Burns re case developments and projects (.4);	0.40	\$250.00
9/1/2023	Timothy Burns	Review and revise motion for relief from stay in light of J. Stang's comments (1.3); participate in call with state court counsel re same (.4); review and consider changes re motion for partial summary judgment on LMI/Interstate consent to settle issue (.8); participate in conference with J. Bair re case insurance developments and projects (.4);	2.90	\$2,827.50
9/1/2023	Brian Cawley	Correspondence with T. Burns and J. Bair regarding Committee joinder and insurance motions for relief from stay (.3); review co-counsel comments on the Committee's lift stay joinder (.3);	0.60	\$252.00
9/1/2023	Nathan Kuenzi	Research deliberative process privilege and other potential governmental privileges in connection with Arrowood 2004 motion (3.0);	3.00	\$1,260.00
9/1/2023	Nathan Kuenzi	Draft email memorandum on deliberative process privilege and related privileges for T. Burns in connection with Arrowood 2004 motion (2.8);	2.80	\$1,176.00
9/1/2023	Jesse Bair	Brief review re draft partial summary judgment motions against LMI and Interstate re lack of consent to settle provisions (.2); correspondence with PSZJ re same (.1);	0.30	\$187.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Pg 78 of 97	Main Document
9/2/2023	Timothy Burns	Continue reviewing and revising insurance motion for relief from stay in light of J. Stang's comments (4.1); correspondence with J. Bair re same (.1);	4.20	\$4,095.00
9/2/2023	Jesse Bair	Correspondence with T. Burns re motion to lift the stay to send insurance demands (.1);	0.10	\$62.50
9/3/2023	Brian Cawley	Analyze additional comments from PSZJ re the Committee's lift stay joinder (.2);	0.20	\$84.00
9/3/2023	Jesse Bair	Correspondence with B. Cawley and T. Burns re motion to lift stay revisions (.1);	0.10	\$62.50
9/3/2023	Timothy Burns	Finalize draft of the Committee's motion for relief from stay joinder (2.2);	2.20	\$2,145.00
9/3/2023	Brian Cawley	Correspondence with J. Bair regarding Committee lift stay joinder, Burns declaration, and related exhibits (.2);	0.20	\$84.00
9/4/2023	Jesse Bair	Correspondence with T. Burns re Arrowood Rule 2004 hearing preparations (.1);	0.10	\$62.50
9/4/2023	Timothy Burns	Analyze information regarding the Diocese Plan Term Sheet and Plan Support Agreement (.4);	0.40	\$390.00
9/4/2023	Brian Cawley	Revise and edit the Committee's insurance lift stay joinder (1.6); revise and edit Burns declaration to same (.5); identify and prepare exhibits to same (.7);	2.80	\$1,176.00
9/4/2023	Nathan Kuenzi	Research and identify relevant case law in connection with upcoming hearing on the Committee's Arrowood Rule 2004 motion (1.5);	1.50	\$630.00
9/4/2023	Timothy Burns	Review memo re deliberative process privilege in connection with Arrowood 2004 motion (.4); review agenda for September 6 hearing (.1); review Debtor's reply in support of 16th omnibus claims objection (.3); review Evanston's response to the Committee's Section 3420 notice letter (.1); review and analysis of notes re Interstate counter and potential response to same (.2);	1.10	\$1,072.50
9/4/2023	Nathan Kuenzi	Correspondence with T. Burns re Arrowood guarantee fund issues (.1);	0.10	\$42.00
9/5/2023	Jesse Bair	Review and edit current draft of the Committee's joinder and memorandum of law in support of certain survivors' motion to lift the stay (.4); review and edit Burns declaration and related exhibits (.2); correspondence with B. Cawley re additional edits needed to same (.2); conference with B. Cawley re same (.2);	1.00	\$625.00

9/5/2023 Brian Cawley

Pg 79 of 97

Participate in conference with J. Bair re edits needed to the Burns lift stay declaration (.2); analyze discovery status letters in the insurance adversary proceedings re representations re scope of Diocesan document productions in connection with lift stay issues (.9); create discovery status letter exhibits for Burns declaration (.3); update Burns declaration to reflect new exhibits (.4); correspondence with J. Bair re revised Burns declaration (.1);

1.90

\$798.00

9/5/2023 Brian Cawley

Draft proposed orders granting the individual motions to lift stay to send insurance demands (.5);

0.50

\$210.00

9/5/2023 Nathan Kuenzi

Analyze Burns Bair interim application and related materials in preparation for upcoming fee hearing (.8);

0.80

\$336.00

9/5/2023 Jesse Bair

Prepare for Committee meeting (.2); participate in Committee meeting for insurance purposes re case strategy, status, and insurance initiatives (1.3);

1.50

\$937.50

9/5/2023 Brian Cawley

Revise and edit draft motion to lift stay, proposed orders, and insurance demand letters for each state court counsel group (.6); correspond with J. Bair re same (.2);

0.80

\$336.00

9/5/2023 Jesse Bair

Identify relevant materials for use during upcoming fee hearing (.2); provide instructions to T. Burns and N. Kuenzi re same and hearing issues (.2);

0.40

\$250.00

9/5/2023 Jesse Bair

Review most recent version of the lift stay motions in order to send insurance demands letters (.3); various correspondence with numerous state court counsel re same (.4); correspondence with K. Dine and B. Michael re hearing date and briefing schedule re same (.1);

0.80

\$500.00

9/5/2023 Jesse Bair

Brief review re Arrowood's objection to the Committee's Rule 2004 motion (.2);

0.20

\$125.00

9/5/2023 Brian Cawley

Finalize motions for relief from stay, the Committee's joinder re same, Burns declaration, related exhibits, and insurance demand letters (1.6); correspondence with J. Bair re revised versions of same (.2);

1.80

\$756.00

9/5/2023 Brian Cawley

Revise and edit Burns lift stay declaration to incorporate partner edits (.2); review case materials for potential additional exhibits to same (.3); correspond with J. Bair regarding revised Burns declaration and exhibits (.1);

0.60

\$252.00

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Pg 80 of 97	Main Document
9/5/2023	Jesse Bair	Brief review re current drafts of motions for partial summary judgment against LMI and Interstate re lack of consent to settle provisions (.2); correspondence with state court counsel re same (.2);	0.40	\$250.00
9/5/2023	Brian Cawley	Analyze recent filings in Delaware mandamus insurance action (.6); draft summary of recent Arrowood Delaware filings for T. Burns and J. Bair (.3);	0.90	\$378.00
9/6/2023	Jesse Bair	Review updated Claro valuation and insurance allocation figures in connection with upcoming mediation sessions (.3);	0.30	\$187.50
9/6/2023	Jesse Bair	Conference with N. Kuenzi re outcome of 9/6/23 omnibus hearing (.1);	0.10	\$62.50
9/6/2023	Jesse Bair	Analyze Arrowood's objection to the Committee's 2004 Motion and begin drafting outline of the Committee reply brief (1.2);	1.20	\$750.00
9/6/2023	Brian Cawley	Analyze Second Circuit case law re the pending proceeding rule and related doctrines in connection with drafting the Committee's reply to Arrowood's 2004 opposition (2.2); draft summary of research for J. Bair (.5); discuss research with J. Bair (.2);	2.90	\$1,218.00
9/6/2023	Nathan Kuenzi	Participate in conference with J. Bair re outcome of 9/6/23 omnibus hearing (.1);	0.10	\$42.00
9/6/2023	Jesse Bair	Correspondence with B. Michael and state court counsel re call to discuss lift stay motion issues (.1);	0.10	\$62.50
9/6/2023	Jesse Bair	Answer questions from state court counsel re proposed insurance demand letters (.2);	0.20	\$125.00
9/6/2023	Jesse Bair	Analysis re case law research needed in connection with responding to Arrowood's objection to the Committee's 2004 motion (.2); provide instructions to B. Cawley re same (.2); analysis re B. Cawley research results re same (.2); correspondence with B. Cawley re supplemental research needed in connection with the Committee's Rule 2004 reply brief (.1);	0.70	\$437.50
9/6/2023	Nathan Kuenzi	Continue analyzing BB fee materials in preparation for upcoming fee hearing (1.4);	1.40	\$588.00
9/6/2023	Jesse Bair	Correspondence with K. Dine re hearing date issues in connection with forthcoming motions to lift the stay in order to send insurance demands (.1);	0.10	\$62.50
9/6/2023	Jesse Bair	Preliminary review re the Diocese's proposed settlement term sheet (.1); correspondence with PSZJ re call with Diocese to discuss same (.1);	0.20	\$125.00

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Main Document
9/6/2023	Brian Cawley	Pg 81 of 97 Research discoverability of reserve information, claim file information, other insured settlements, and related issues in connection with the Committee's reply to Arrowood's Rule 2004 objection (2.4); draft summary of research and send to J. Bair (.8);	3.20      \$1,344.00
9/6/2023	Jesse Bair	Analyze the Diocese of Camden order denying plan confirmation in connection with ongoing plan negotiations in the DRVC case (1.0);	1.00      \$625.00
9/6/2023	Nathan Kuenzi	Participate in conference with J. Bair re upcoming omnibus hearing (.1); continue preparing for same (.2);	0.30      \$126.00
9/6/2023	Jesse Bair	Conference with N. Kuenzi re preparations for 9/6/23 omnibus hearing (.1);	0.10      \$62.50
9/6/2023	Nathan Kuenzi	Draft summary of outcome of 9/6/23 fee and omnibus hearing (.2);	0.20      \$84.00
9/6/2023	Timothy Burns	Review correspondence with BB and state court counsel re insurance motion for relief from stay (.2); review N. Kuenzi's summary of September 6 hearing outcome (.1); review notice re amended hearing re derivative standing motion (.1); review correspondence with BB and PSZJ re motion for relief issues (.1);	0.50      \$487.50
9/6/2023	Nathan Kuenzi	Participate in September 6 fee and omnibus hearing (1.5);	1.50      \$630.00
9/6/2023	Brian Cawley	Review correspondence from state court counsel re motion for relief from stay issues (.2);	0.20      \$84.00
9/7/2023	Jesse Bair	Review correspondence with K. Dine and the court re motion to lift stay hearing date (.1);	0.10      \$62.50
9/7/2023	Jesse Bair	Prepare for call with certain state court counsel re case insurance initiatives (.1); participate in call with certain state court counsel re same and upcoming motion to lift stay filing (.5);	0.60      \$375.00
9/7/2023	Jesse Bair	Participate in initial team strategy meeting with PSZJ team for insurance purposes re upcoming meeting with the Diocese re draft settlement term sheet and upcoming mediation session (.2); participate in follow-up team strategy meeting with PSZJ for insurance purposes re same (.3);	0.50      \$312.50
9/7/2023	Brian Cawley	Correspondence with state court counsel re proposed orders granting motions to lift the stay (.2);	0.20      \$84.00
9/7/2023	Brian Cawley	Prepare exhibits to the Committee's Rule 2004 reply brief (.2);	0.20      \$84.00
9/7/2023	Jesse Bair	Review correspondence from the mediators re Lexington counter (.1); correspondence with T. Burns re potential response to same (.1);	0.20      \$125.00

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Pg 82 of 97	Main Document
9/7/2023	Jesse Bair	Participate in meeting with the Diocese re the Diocese's proposed settlement term sheet (1.1);	0.10	\$687.50
9/7/2023	Jesse Bair	Conference with T. Burns re insurance strategy for upcoming mediation sessions (.1);	0.10	\$62.50
9/7/2023	Brian Cawley	Review and edit the motions to lift stay to incorporate new hearing and objection deadlines (.3);	0.30	\$126.00
9/7/2023	Brian Cawley	Prepare for call with certain state court counsel re case insurance initiatives (.2); participate in call with certain state court counsel re same and upcoming motion to lift stay filing (.5);	0.70	\$294.00
9/7/2023	Jesse Bair	Correspondence with B. Cawley re additional research needed in connection with the Committee's Rule 2004 reply brief (.1);	0.10	\$62.50
9/7/2023	Jesse Bair	Correspondence with B. Cawley re additional edit needed to the motions to lift stay (.1);	0.10	\$62.50
9/7/2023	Nathan Kuenzi	Analyze additional issues relating to potential privilege arguments Arrowood may raise in connection with the Committee's Rule 2004 motion (.8); correspondence with J. Bair re same (.2);	1.00	\$420.00
9/7/2023	Brian Cawley	Research and analyze case law re examples of Rule 2004 examinations of insurance companies and scope of same (2.5) ;draft summary of case law for J. Bair (.4);	2.90	\$1,218.00
9/7/2023	Jesse Bair	Review K. Dine's suggested edits to the insurance demand letters (.1); correspondence with B. Cawley re same (.1);	0.20	\$125.00
9/7/2023	Jesse Bair	Draft the Committee's reply brief in support of its Rule 2004 motion (5.1);	5.10	\$3,187.50
9/7/2023	Jesse Bair	Analyze case law research in connection with the Committee's Rule 2004 reply brief (.7);	0.70	\$437.50
9/7/2023	Brian Cawley	Correspond with J. Bair regarding revised language for insurance demand letters (.2);	0.20	\$84.00
9/7/2023	Jesse Bair	Draft Bair declaration and related exhibit in support of the Committee's Rule 2004 reply brief (.3);	0.30	\$187.50
9/7/2023	Brian Cawley	Correspond with each state court counsel group re revised motions for relief from stay (1.0);	1.00	\$420.00
9/7/2023	Nathan Kuenzi	Analyze Rule 2004 materials, exhibits, and relevant case law to identify key documents for use in preparing for Rule 2004 hearing (2.3);	2.30	\$966.00
9/8/2023	Nathan Kuenzi	Conference with T. Burns re Guarantee Fund issues in connection with ongoing Plan negotiations (.2);	0.20	\$84.00
9/8/2023	Jesse Bair	Edit and finalize the Committee's Rule 2004 reply brief, Bair declaration, and related exhibits (.5); correspondence with PSZJ re same (.1);	0.60	\$375.00

9/8/2023 Jesse Bair

Pg 83 of 97

		Conference with N. Kuenzi re Guarantee Fund issues in connection with ongoing Plan negotiations (.2); provide instructions to N. Kuenzi and B. Cawley re additional Guarantee Fund research needed in connection with ongoing Plan negotiations (.2); follow-up correspondence re same (.1);	0.50	\$312.50
9/8/2023	Jesse Bair	Review and respond to questions from state court counsel re lift stay motion and insurance demand letters (.2);	0.20	\$125.00
9/8/2023	Jesse Bair	Participate in call with T. Burns re outcome of meeting with Jones Day re the Diocese's proposed settlement term sheet (.2);	0.20	\$125.00
9/8/2023	Karen Dempski	Prepare hearing prep binders for Rule 2004 hearing against Arrowood (1.4);	1.40	\$504.00
9/8/2023	Jesse Bair	Review and incorporate K. Dine's suggested edits into the Committee's Rule 2004 reply brief (.2);	0.20	\$125.00
9/8/2023	Jesse Bair	Participate in call with state court counsel re potential Lexington response (.1);	0.10	\$62.50
9/8/2023	Brian Cawley	Research additional Guarantee Fund issues in connection with ongoing Plan negotiations, including potential set off arguments and per claim recovery (1.7);	1.70	\$714.00
9/8/2023	Brian Cawley	Revise and edit the Committee's Rule 2004 reply brief against Arrowood (1.5);	1.50	\$630.00
9/8/2023	Nathan Kuenzi	Participate in conference with J. Bair and B. Cawley re additional Guarantee Fund research needed in connection with ongoing Plan negotiations (.2);	0.20	\$84.00
9/8/2023	Brian Cawley	Discuss guaranty fund research project with J. Bair and N. Kuenzi (.2);	0.20	\$84.00
9/8/2023	Jesse Bair	Correspondence with B. Michael re potential response to Lexington's recent counter (.1);	0.10	\$62.50
9/8/2023	Nathan Kuenzi	Analyze necessity of Arrowood claim segregation in Plan in connection with recovery against New York Guarantee Fund (1.4); draft email memorandum for J. Bair re same (.2);	1.60	\$672.00
9/10/2023	Jesse Bair	Analysis re state court counsel's suggested edits to the motion to lift stay papers (.3); correspondence with state court counsel re same (.2);	0.50	\$312.50
9/10/2023	Brian Cawley	Implement partner edits into Burns declaration and Committee lift stay joinder (.5); correspondence with J. Bair re revised lift stay materials (.2); correspond with each state court counsel group re revised lift stay papers (.5);	1.20	\$504.00
9/10/2023	Jesse Bair	Review proposed orders granting certain survivors' motions to lift the stay (.1);	0.10	\$62.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Main Document
9/10/2023 Jesse Bair	Pg 84 of 97		
9/10/2023 Jesse Bair	Review and edit the Committee's joinder and memorandum of law in support of certain survivors' motion to lift the stay (.2); Correspondence with B. Cawley and T. Burns re additional edits needed to finalize the Committee's motion to lift stay papers (.2);	0.20	\$125.00
9/10/2023 Jesse Bair	Review and edit Burns Declaration and related exhibits in support of certain survivors' motion to lift the stay (.2);	0.20	\$125.00
9/11/2023 Jesse Bair	Review Settlement Conference Order for upcoming mediations (.1);	0.10	\$62.50
9/11/2023 Jesse Bair	Review and edit final version of the Committee lift stay joinder, Burns declaration, and related exhibits (.2); correspondence with PSZJ and B. Cawley re same, filing, and notice of hearing (.3);	0.50	\$312.50
9/11/2023 Timothy Burns	Review and respond to correspondence re adjournment of Rule 2004 hearing with PSZJ, J. Bair, and Arrowood (.2); participate in call with J. Bair re same (.1); participate in call with state court counsel re same (.1);	0.40	\$390.00
9/11/2023 Jesse Bair	Participate in call with particular state court counsel re lift stay motion and insurance demand letters (.4);	0.40	\$250.00
9/11/2023 Jesse Bair	Participate in call with different state court counsel re lift stay motions and insurance demand letters (.4);	0.40	\$250.00
9/11/2023 Jesse Bair	Correspondence with PSZJ re logistics for upcoming mediation sessions (.1);	0.10	\$62.50
9/11/2023 Jesse Bair	Review Committee correspondence with the mediators re Plan and settlement negotiations (.1); review correspondence with state court counsel re same (.1);	0.20	\$125.00
9/11/2023 Brian Cawley	Correspond with PSZJ regarding status of Committee lift stay joinder filing (.2); correspond with J. Bair regarding status of state court counsel lift stay motions and Committee joinder filings (.2); correspond with state court counsel regarding lift stay motion filings (.2);	0.60	\$252.00
9/12/2023 Jesse Bair	Analysis re insurer exposures in preparation for upcoming mediation session (.1);	0.10	\$62.50
9/12/2023 Jesse Bair	Analyze letter from the Diocese re the Committee's and state court counsel's lift stay motions (.2);	0.20	\$125.00
9/12/2023 Jesse Bair	Correspondence with T. Burns re potential Interstate and Lexington counters (.1);	0.10	\$62.50
9/12/2023 Jesse Bair	Analysis re potential additional insurance demand letters (.2); correspondence with state court counsel re same (.1);	0.30	\$187.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Pg 85 of 97	Main Document
9/12/2023 Jesse Bair		Participate in call with T. Burns re outcome of call with state court counsel re lift stay motions (.2);	0.20	\$125.00
9/12/2023 Brian Cawley		Continue researching additional Guarantee Fund issues in connection with ongoing Plan negotiations, including potential set off arguments and per claim recovery (2.3);	2.30	\$966.00
9/12/2023 Brian Cawley		Analyze potential new insurance demand letter claims (.6); draft email to J. Bair summarizing claim valuation and coverage for same (.3);	0.90	\$378.00
9/12/2023 Jesse Bair		Correspond with PSZJ re potential consent to settle partial summary judgment motion (.1);	0.10	\$62.50
9/12/2023 Timothy Burns		Review and respond to correspondence with PSZJ re upcoming mediation session (.2); review correspondence from BB team re Rule 2004 hearing (.1); brief review of emails and filings re motions for relief from stay (.2); review correspondence from PSZJ to mediators and related emails from state court counsel to Committee professionals re same (.2); correspondence with J. Bair re Interstate and Lexington counters (.1); participate in call with J. Bair re outcome of call with state court counsel re relief from stay motions (.2); review J. Bair correspondence re motions for partial summary judgment on consent to settle issue (.1); review correspondence with J. Bair and PSZJ re Interstate and Lexington counters (.1); review reply in support of motion to reconsider withdrawal of the reference (.2);	1.40	\$1,365.00
9/13/2023 Jesse Bair		Analysis re Debtor request for meet and confer re insurance demand lift stay motion (.1); correspondence with B. Michael re same, new lift stay hearing date, and insurer counters (.2);	0.30	\$187.50
9/13/2023 Brian Cawley		Complete additional research re Guarantee Fund issues in connection with ongoing Plan negotiations, including potential set off arguments and per claim recovery (3.4); draft summary of research for J. Bair (1.0);	4.40	\$1,848.00
9/14/2023 Jesse Bair		Correspondence with B. Michael re revised hearing date on the motion to lift stay (.1);	0.10	\$62.50
9/14/2023 Jesse Bair		Review correspondence with Jones Day and B. Michael re motion to lift stay meet and confer (.1);	0.10	\$62.50
9/14/2023 Jesse Bair		Review B. Michael summary re outcome of mediation session with Debtor (.1); review T. Burns and I. Nasatir correspondence re same (.1); draft responses to B. Michael question re insurance issues raised during session (.2);	0.40	\$250.00

9/14/2023 Timothy Burns

Pg 86 of 97  
Review, analyze, and respond to PSZJ mediation update email re session with the Debtor and mediators (.5); additional correspondence with PSZJ and J. Bair re same (.3); review correspondence with PSZJ and the Court re motions for relief from stay hearing (.1); review correspondence from LMI re motions for relief from stay hearing (.1); review K. Dine correspondence re mediation meeting (.1);

1.20 \$1,170.00

9/14/2023 Timothy Burns

Correspondence with J. Bair re case status and ongoing insurance projects (.1);

0.10 \$97.50

9/15/2023 Jesse Bair

Prepare for motion to lift stay meet and confer with the Diocese (.1); participate in motion to lift stay meet and confer with the Diocese (.6); participate in post-meeting call with T. Burns re outcome of same and next-steps (.2);

0.90 \$562.50

9/15/2023 Jesse Bair

Participate in conference with B. Cawley re case status, upcoming mediation, and research projects needed re motion to lift stay issues (.4);

0.40 \$250.00

9/15/2023 Timothy Burns

Participate in call with J. Bair re upcoming meet and confer with the Diocese and insurance mediation prep and strategy (.6);

0.60 \$585.00

9/15/2023 Timothy Burns

Prepare for motion to lift stay meet and confer with the Diocese (.4); participate in motion to lift stay meet and confer with the Diocese (.6); participate in post-meeting call with J. Bair re outcome of same and next-steps (.2);

1.20 \$1,170.00

9/15/2023 Jesse Bair

Review and respond to correspondence with LMI, B. Michael, and the Court re motion to lift stay hearing issues (.2);

0.20 \$125.00

9/15/2023 Jesse Bair

Participate in call with T. Burns re upcoming meet and confer with the Diocese and insurance mediation prep and strategy (.6);

0.60 \$375.00

9/15/2023 Brian Cawley

Participate in conference with J. Bair re case status, upcoming mediation, and research projects needed re motion to lift stay issues (.4); analyze case law previously cited by insurers purportedly supporting the proposition that insurance demands implicate the automatic stay (.7);

1.10 \$462.00

9/15/2023 Jesse Bair

Review monthly Diocesan PSIP information (.1);

0.10 \$62.50

9/15/2023 Jesse Bair

Identify relevant materials and provide instructions to K. Dempski re preparing insurance mediation prep binders (.2);

0.20 \$125.00

9/15/2023 Jesse Bair

Review Order regarding mediation logistics (.1);

0.10 \$62.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Pg 87 of 97	Main Document
9/15/2023	Jesse Bair	Analysis re Judge Glenn's parish preliminary injunction ruling and case law re automatic stay issues in connection with upcoming meet and confer with the Diocese (.4);	0.40	\$250.00
9/17/2023	Timothy Burns	Travel to New York from Madison for mediation [billed at 1/2 travel rate] (5.4);	5.40	\$2,632.50
9/17/2023	Jesse Bair	Travel to New York from Madison for mediation [billed at 1/2 travel rate] (6.1);	6.10	\$1,906.25
9/17/2023	Timothy Burns	Prepare for mediation by reviewing insurance binder materials (.8);	0.80	\$780.00
9/18/2023	Timothy Burns	Participate in conference with J. Bair re mediation preparation and insurance strategy (.4); participate in full day mediation session (9.1); participate in post-mediation discussion re mediation strategy with J. Bair (.2);	9.70	\$9,457.50
9/18/2023	Jesse Bair	Provide instructions to B. Cawley re edits needed to draft insurance demands (.1);	0.10	\$62.50
9/18/2023	Jesse Bair	Participate in full-day mediation session (9.1); participate in post-mediation discussion re mediation strategy with T. Burns (.2);	9.30	\$5,812.50
9/18/2023	Brian Cawley	Prepare materials for T. Burns review re derivative standing motion and forthcoming objection (.5);	0.50	\$210.00
9/18/2023	Brian Cawley	Prepare for mediation session (.3); participate in portion of mediation session via Zoom (4.7); summarize notes from mediation for partner review (.5);	5.50	\$2,310.00
9/18/2023	Brenda Horn-Edwards	Draft BB monthly fee statement (.6); generate and edit Exhibit A to same (.1);	0.70	\$252.00
9/18/2023	Jesse Bair	Participate in conference with T. Burns re mediation preparation and insurance strategy (.4);	0.40	\$250.00
9/18/2023	Brian Cawley	Draft additional insurance demand letter (.9); draft new language for insurance demand template (.2); update prior insurance demands with new language (.3); correspondence with J. Bair re revised insurance demand letters (.2);	1.60	\$672.00
9/19/2023	Timothy Burns	Participate in full-day mediation session (8.7);	8.70	\$8,482.50
9/19/2023	Jesse Bair	Return travel to Madison from New York mediation [billed at 1/2 travel rate] (5.6);	5.60	\$1,750.00
9/19/2023	Brian Cawley	Continue revising insurance demand letters (1.6);	1.60	\$672.00
9/19/2023	Timothy Burns	Begin preparing for Section 349 derivative standing hearing, including review of Camden 9019 decision and objections to the Committee's motion for derivative standing (1.6);	1.60	\$1,560.00
9/19/2023	Brian Cawley	Analyze Diocese Objection to Committee Section 349 derivative standing motion (.5); research case law relied upon by Diocese (1.5);	2.00	\$840.00

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Pg 88 of 97	Main Document
9/19/2023	Timothy Burns	Return travel to Madison from New York mediation [billed at 1/2 travel rate] (4.6);	4.60	\$2,242.50
9/19/2023	Jesse Bair	Participate in second day of mediation session (8.7);	8.70	\$5,437.50
9/19/2023	Brian Cawley	Participate in portion of day 2 of mediation session via Zoom (3.8); summarize mediation notes for partner review (.4);	4.20	\$1,764.00
9/20/2023	Brian Cawley	Research reliance requirement under Section 349 (2.5); draft summary of research for T. Burns and J. Bair (.7);	3.20	\$1,344.00
9/20/2023	Jesse Bair	Participate in call with T. Burns re motions for partial summary judgment drafts (.2);	0.20	\$125.00
9/20/2023	Jesse Bair	Participate in conference with B. Cawley re insurance next-steps and ongoing projects (.2); participate in additional conference with B. Cawley re additional research needed in connection with Committee derivative standing reply brief (.2);	0.40	\$250.00
9/20/2023	Jesse Bair	Participate in call with T. Burns re case insurance strategy, briefing, and next-steps re same (.4);	0.40	\$250.00
9/20/2023	Timothy Burns	Participate in call with J. Bair re case insurance strategy, briefing, and next-steps re same (.4); review briefing and outline key arguments re the Committee's Section 349 reply brief (2.3); participate in call with state court counsel re mediation (.2); review B. Cawley's research summary re reliance issue re section 349 claims (.2); participate in call with J. Bair re draft motions for partial summary judgment on consent to settle issue (.2); review J. Bair correspondence to Diocese re same (.1); review correspondence with J. Bair and the Diocese re derivative standing motion (.1);	3.50	\$3,412.50
9/20/2023	Jesse Bair	Analysis re logistics for upcoming insurance hearing and mediation sessions (.1);	0.10	\$62.50
9/20/2023	Jesse Bair	Review T. Burns' correspondence re key thoughts re responding to insurer and Diocese Section 349 derivative standing objection (.3);	0.30	\$187.50
9/20/2023	Timothy Burns	Review correspondence with PSZJ and J. Bair re Debtor's Plan concerns (.2); participate in call with J. Bair re same (.2);	0.40	\$390.00
9/20/2023	Brian Cawley	Discuss mediation outcome and next steps with J. Bair (.2);	0.20	\$84.00
9/20/2023	Brian Cawley	Research standing/ripeness issues for injunctive relief under Section 349 and other claims (3.4); draft summary of research for J. Bair in connection with the Committee's Section 349 derivative standing reply brief (1.0);	4.40	\$1,848.00

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Main Document
9/20/2023 Jesse Bair	Pg 89 of 97 Participate in additional conference with T. Burns re insurance Plan issues (.2);	0.20	\$125.00
9/20/2023 Jesse Bair	Begin drafting the Committee's Section 349 derivative standing reply brief (1.0);	1.00	\$625.00
9/20/2023 Jesse Bair	Review correspondence from the Diocese re insurance Plan issues (.1); correspondence with PSZJ and T. Burns re same (.1);	0.20	\$125.00
9/20/2023 Jesse Bair	Analyze the Diocese's response to the Committee's Section 349 derivative standing motion (.4); draft correspondence to the Diocese re same and potential resolution of motion (.4);	0.80	\$500.00
9/20/2023 Jesse Bair	Review and edit draft motions for partial summary judgment re consent to settle issue against LMI and Interstate (.4); draft correspondence to Diocese re demand to file same (.2); correspondence with PSZJ re same (.1);	0.70	\$437.50
9/20/2023 Nathan Kuenzi	Prepare for conference with J. Bair (.1); participate in conference with J. Bair re research needed re insurer administrative claim arguments in connection with the Committee's Section 349 derivative standing motion (.2);	0.30	\$126.00
9/20/2023 Nathan Kuenzi	Research case law re the insurers' administrative claim argument in connection with the Committee's Section 349 derivative standing motion (1.0);	1.00	\$420.00
9/20/2023 Jesse Bair	Provide instructions to N. Kuenzi re research needed re insurer administrative claim arguments (.2);	0.20	\$125.00
9/20/2023 Jesse Bair	Analyze the insurers' objection to the Committee's Section 349 derivative standing motion (.7);	0.70	\$437.50
9/21/2023 Brian Cawley	Review and edit the Committee's Section 349 derivative standing reply brief (1.8);	1.80	\$756.00
9/21/2023 Jesse Bair	Continue drafting the Committee's Section 349 derivative standing reply brief (5.9); correspondence with K. Dine re suggested edit to same (.1); participate in call with T. Burns re same (.2);	6.20	\$3,875.00
9/21/2023 Brian Cawley	Correspond with J. Bair and N. Kuenzi re Section 349 research question (.2);	0.20	\$84.00
9/21/2023 Nathan Kuenzi	Research issue as to whether violation of New York public policy constitutes a deceptive practice under Section 349 (.3);	0.30	\$126.00
9/21/2023 Timothy Burns	Participate in Zoom mediation session with the Diocese (3.0); participate in call with J. Bair re the Committee's Section 349 derivative standing reply brief (.2);	3.20	\$3,120.00

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Main Document
9/21/2023 Jesse Bair	Pg 90 of 97 Participate in portion of Zoom mediation session with the Diocese (2.0);	2.00	\$1,250.00
9/21/2023 Nathan Kuenzi	Analyze case law re approving settlement agreements under Rule 9019 and insurer administrative claims in connection with upcoming Section 349 derivative standing oral argument (2.5);	2.50	\$1,050.00
9/22/2023 Jesse Bair	Conference with T. Burns re derivative standing reply brief (.2);	0.20	\$125.00
9/22/2023 Nathan Kuenzi	Draft summary memorandum re insurer administrative claim issues in connection with upcoming Section 349 derivative standing oral argument (2.0);	2.00	\$840.00
9/22/2023 Jesse Bair	Begin preparing for Rule 2004 oral argument, including review of relevant case law (1.2);	1.20	\$750.00
9/22/2023 Jesse Bair	Edit and finalize the Committee's Section 349 derivative standing reply brief (.9); correspondence with PSZJ re same (.1);	1.00	\$625.00
9/22/2023 Jesse Bair	Review and respond to additional suggested edits from I. Nasatir re the Committee's Section 349 derivative standing reply brief (.2);	0.20	\$125.00
9/22/2023 Timothy Burns	Continue preparing for hearing on the Committee's Section 349 derivative standing motion (.8); conference with J. Bair re derivative standing reply brief (.2);	1.00	\$975.00
9/22/2023 Brian Cawley	Correspond with T. Burns regarding derivative standing hearing preparation materials (.2);	0.20	\$84.00
9/23/2023 Brian Cawley	Email J. Bair regarding status of Arrowood Delaware insurance action (.1);	0.10	\$42.00
9/23/2023 Timothy Burns	Review agenda for upcoming hearing (.1); review correspondence from K. Dine to mediators (.1); correspondence with J. Bair re same (.1); continue preparing for Section 349 derivative standing hearing (3.9);	4.20	\$4,095.00
9/23/2023 Brian Cawley	Prepare derivative standing hearing preparation materials for T. Burns (1.1);	1.10	\$462.00
9/23/2023 Jesse Bair	Continue preparing for Rule 2004 oral argument, including reviewing relevant case law, exhibits, and Delaware regulatory orders (3.0);	3.00	\$1,875.00
9/24/2023 Jesse Bair	Review the mediators' status report (.1);	0.10	\$62.50
9/24/2023 Timothy Burns	Continue preparing for Section 349 derivative standing hearing (4.2);	4.20	\$4,095.00
9/24/2023 Jesse Bair	Correspondence with T. Burns re Diocese's lack of response to email re potential resolution of Section 349 motion (.1);	0.10	\$62.50
9/24/2023 Jesse Bair	Continue preparing for Rule 2004 oral argument, including reviewing relevant case law, exhibits, and drafting outline re same (2.7);	2.70	\$1,687.50
9/24/2023 Jesse Bair	Review agenda for the 9/26 hearing (.1);	0.10	\$62.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46		Main Document
9/25/2023	Timothy Burns	Pg 91 of 97 Continue preparing for Section 349 derivative standing hearing (5.0); conference with J. Bair re same and Arrowood 2004 motion (.4);	5.40	\$5,265.00
9/25/2023	Jesse Bair	Travel to New York from Madison for insurance hearing and mediation [billed at 1/2 travel rate] (4.2);	4.20	\$1,312.50
9/25/2023	Jesse Bair	Participate in conference with T. Burns re insurance strategy for upcoming hearings and mediation (.4);	0.40	\$250.00
9/25/2023	Timothy Burns	Travel to New York from Madison for insurance hearing and mediation [billed at 1/2 travel rate] (4.0);	4.00	\$1,950.00
9/25/2023	Jesse Bair	Additional analysis re recent report from the mediators (.1);	0.10	\$62.50
9/25/2023	Brian Cawley	Research ability of insurers to file Plan in bankruptcy (1.3);	1.30	\$546.00
9/25/2023	Jesse Bair	Continue preparing for Rule 2004 oral argument (1.6);	1.60	\$1,000.00
9/26/2023	Jesse Bair	Correspondence with PSZJ and T. Burns re logistics for upcoming mediation session (.1);	0.10	\$62.50
9/26/2023	Jesse Bair	Participate in hearing re the Arrowood 2004 motion, Committee derivative standing motion, and case status conference (1.8); participate in post-hearing conference with Debtor's counsel re outcome of same (.3); participate in post-hearing meeting with PSZJ re same and next-steps (.2); participate in post-hearing call with state court counsel re same (.4); participate in post-hearing conference with T. Burns re hearing outcome, follow-up, and strategy for meet and confer with Arrowood (.4);	3.10	\$1,937.50
9/26/2023	Jesse Bair	Continue preparing for hearing on the Arrowood 2004 motion (1.3);	1.30	\$812.50
9/26/2023	Timothy Burns	Continue preparing for Section 349 derivative standing hearing (3.3); participate in hearing on same, Arrowood 2004 motion, and omnibus status conference (1.8); participate in post-hearing conference with Debtor's counsel re hearing outcome (.3); participate in post-hearing meeting with PSZJ re same (.2); participate in post-hearing call with state court counsel re same (.4); participate in post-hearing conference with J. Bair re hearing outcome, follow-up, and strategy for meet and confer with Arrowood (.4);	6.40	\$6,240.00
9/26/2023	Jesse Bair	Review and respond to correspondence with Arrowood and I. Nasatir re meet and confer re the Court's Rule 2004 ruling (.2); begin preparing for meet and confer with Arrowood (.3);	0.50	\$312.50

20-12345-mg	Doc 2662	Filed 11/15/23 Entered 11/15/23 14:46:46	Main Document
9/27/2023	Timothy Burns	Pg 92 of 97 Prepare for meet and confer with Arrowood (.8); attended same and subsequent calls with Arrowood re same (3.3); attended hearing (.8); participate in portion of in-person mediation session (3.1);	8.00 \$7,800.00
9/27/2023	Jesse Bair	Participate in supplemental hearing with Judge Glenn re Arrowood 2004 discovery issues (.8);	0.80 \$500.00
9/27/2023	Jesse Bair	Prepare for meet and confer with Arrowood (.6);	0.60 \$375.00
9/27/2023	Timothy Burns	Return travel to Madison from New York [billed at 1/2 travel rate] (5.2);	5.20 \$2,535.00
9/27/2023	Brian Cawley	Participate in portion of mediation session via Zoom (2.7); draft summary of notes of mediation (.4);	3.10 \$1,302.00
9/27/2023	Jesse Bair	Participate in in-person meet and confer with Arrowood, including follow-up telephone conferences re potential resolution of discovery issues (3.3);	3.30 \$2,062.50
9/27/2023	Jesse Bair	Participate in portion of in-person mediation session (3.1);	3.10 \$1,937.50
9/27/2023	Jesse Bair	Return travel to Madison from New York [billed at 1/2 travel rate] (5.6);	5.60 \$1,750.00
9/28/2023	Jesse Bair	Review correspondence from the mediators re October mediation sessions (.1);	0.10 \$62.50
9/28/2023	Jesse Bair	Review correspondence from B. Michael re transfer settlements (.1);	0.10 \$62.50
9/28/2023	Timothy Burns	Review correspondence with the mediators and PSZJ re mediation (.1); review correspondence with J. Bair and the Diocese re Arrowood Rule 2004 meet and confer (.1); review J. Bair correspondence with the Diocese re meet and confer re consent to settle partial summary judgment motions (.1);	0.30 \$292.50
9/28/2023	Jesse Bair	Review and respond to correspondence with the Diocese re Arrowood 2004 issues and meet and confer re proposed partial summary judgment motions (.2);	0.20 \$125.00
9/29/2023	Jesse Bair	Review B. Michael correspondence with state court counsel re case update and developments (.1);	0.10 \$62.50
9/29/2023	Jesse Bair	Prepare for call with Reed Smith re case insurance issues (.2); participate in conference with Reed Smith and T. Burns re same (.8); participate in post-conference meeting with T. Burns re outcome of same and potential next-steps (.2)	1.20 \$750.00
9/29/2023	Timothy Burns	Participate in conference with Reed Smith and J. Bair re case insurance issues (.8); participate in post-conference meeting with J. Bair re outcome of same and potential next-steps (.2)	1.00 \$975.00

9/29/2023 Jesse Bair	Review Interstate letter to the Court re Interstate's improper disclosure of survivor information (.1);	0.10	\$62.50
9/30/2023 Timothy Burns	Research and analysis re insurance neutrality issues re Plan drafting (.8);	0.80	\$780.00

**Total Hours and Fees****296.20 \$182,575.75****EXPENSES**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
9/11/2023	United Airlines, T. Burns (MSN-EWR Sept. 11-13)	\$832.40
9/11/2023	Delta Airlines, J. Bair (MSN-LGA Sept. 11-12)	\$976.40
9/17/2023	Uber, T. Burns (airport to hotel)	\$175.78
9/17/2023	Delta Airlines, J. Bair (MSN-LGA, Sept. 17-21)	\$967.10
9/17/2023	Hotel, T. Burns (3 nights)	\$2,181.00
9/17/2023	Travel meal, T. Burns	\$8.73
9/17/2023	United Airlines, T. Burns (MSN-EWR, Sept. 17-22)	\$701.95
9/17/2023	Travel meal, J. Bair	\$15.91
9/17/2023	Hotel, J. Bair (3 nights)	\$2,181.00
9/18/2023	Travel meal, T. Burns	\$11.90
9/18/2023	Travel meal, T. Burns	\$1.50
9/18/2023	Travel meal, J. Bair	\$9.19
9/18/2023	Travel meal, J. Bair	\$16.28
9/18/2023	Travel meal, T. Burns	\$5.84
9/18/2023	Taxi, J. Bair and T. Burns	\$62.71
9/18/2023	Travel meal, T. Burns	\$2.62
9/19/2023	Travel meal, J. Bair	\$18.32
9/19/2023	Travel meal, T. Burns	\$18.84
9/19/2023	Travel meal, J. Bair	\$20.71
9/19/2023	Travel meal, J. Bair	\$5.63
9/19/2023	Travel meal, T. Burns	\$9.79
9/19/2023	Travel meal, T. Burns	\$4.12
9/19/2023	Travel meal, T. Burns	\$12.00
9/19/2023	Airport parking, J. Bair	\$28.00
9/19/2023	Uber, T. Burns (mediation to airport)	\$97.84
9/19/2023	Uber, J. Bair (mediation to airport)	\$157.29
9/20/2023	Delta Airlines Wi-Fi Onboard, J. Bair	\$15.95
9/20/2023	Uber, T. Burns	\$117.40
9/25/2023	Delta, J. Bair (MSN-LGA, Sept. 25-28)	\$1,217.80
9/25/2023	Hotel, J. Bair (3 nights)	\$2,409.00
9/25/2023	Taxi, J. Bair (airport to hotel)	\$93.35
9/25/2023	United Airlines, T. Burns (MSN-EWR Sept. 25-28)	\$1,049.80
9/25/2023	Hotel, T. Burns (3 nights)	\$2,409.00

	Pg 94 of 97	
9/25/2023	Travel meal, T. Burns	\$4.49
9/25/2023	Travel meal, J. Bair	\$22.76
9/25/2023	Uber, T. Burns (airport to hotel)	\$140.84
9/25/2023	Delta Airlines Wi-Fi Onboard, J. Bair	\$4.95
9/26/2023	Travel meal, J. Bair	\$20.90
9/26/2023	Travel meal, J. Bair	\$27.71
9/26/2023	Travel meal, T. Burns	\$19.54
9/26/2023	Uber, J. Bair and T. Burns (hotel to courthouse)	\$31.63
9/26/2023	FedEx pkg. to T. Burns (binder)	\$159.42
9/27/2023	Airport parking, T. Burns	\$30.00
9/27/2023	Travel meal, T. Burns	\$26.72
9/27/2023	Uber, T. Burns (hotel to airport)	\$173.84
9/27/2023	Travel meal, T. Burns	\$24.36
9/27/2023	Uber, J. Bair (hotel to airport)	\$167.68
9/27/2023	Airport parking, J. Bair	\$30.00
9/27/2023	Travel meal, J. Bair	\$25.50
9/28/2023	Delta Airlines, Wi-Fi Onboard, J. Bair	\$15.95

<b>Total Expenses</b>	<b>\$16,761.44</b>
-----------------------	--------------------

#### Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brenda Horn-Edwards	Paralegal	0.70	\$360.00	\$252.00
Brian Cawley	Associate	69.70	\$420.00	\$29,274.00
Jesse Bair	Partner	21.50	\$312.50	\$6,718.75
Jesse Bair	Partner	85.20	\$625.00	\$53,250.00
Karen Dempski	Paralegal	1.40	\$360.00	\$504.00
Nathan Kuenzi	Associate	23.10	\$420.00	\$9,702.00
Timothy Burns	Partner	19.20	\$487.50	\$9,360.00
Timothy Burns	Partner	75.40	\$975.00	\$73,515.00

**Total Due This Invoice: \$199,337.19**

**EXHIBIT G**

**Proposed Order**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re: ) Case No. 20-12345 (MG)  
THE ROMAN CATHOLIC DIOCESE OF ) Chapter 11  
ROCKVILLE CENTRE, NEW YORK, )  
Debtor.<sup>1</sup> )  
\_\_\_\_\_  
)

**ORDER GRANTING  
NINTH INTERIM APPLICATION FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES BY  
BURNS BAIR LLP AS SPECIAL INSURANCE COUNSEL  
FOR THE PERIOD FROM JUNE 1, 2023 THROUGH SEPTEMBER 30, 2023**

Burns Bair LLP (“Burns Bair”) as Special Insurance Counsel to the Official Committee of Unsecured Creditors in the above-captioned case, filed its Ninth Interim Application for Compensation for the Period from June 1, 2023 through September 30, 2023 (the “Fee Application”). The Court has reviewed the Fee Application and finds that: (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (b) notice of the Fee Application, and any hearing on the Fee Application, was adequate under the circumstances; and (c) all persons with standing have been afforded the opportunity to be heard on the Fee Application. Accordingly, it is hereby

**ORDERED** that the Ninth Fee Application is GRANTED. The Debtor in the above case shall pay to Burns Bair interim fees in the total amount of \$533,962.11 for services rendered and actual and necessary expenses in the Chapter 11 case during the Interim Compensation Period, after deducting interim payments already received by Burns Bair pursuant

---

<sup>1</sup> The Debtor in this chapter 11 case is The Roman Catholic Diocese of Rockville Centre, New York, the last four digits of its federal tax identification number are 7437, and its mailing address is 50 North Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571-9023.

to the Interim Compensation Orders for necessary professional services rendered by Burns Bair,  
for the period June 1, 2023 through September 30, 2023.

**ORDERED** that this Court retains jurisdiction with respect to all matters arising  
from or related to the implementation, interpretation, and enforcement of this Order.

Dated: \_\_\_\_\_, 2023.  
New York, New York

---

THE HONORABLE MARTIN GLENN  
U.S. BANKRUPTCY JUDGE